

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

IN RE: )  
 ) CASE NO: 22-32998  
HOUSTON REAL ESTATE PROPERTIES )  
LLC, ) CHAPTER 7  
 )  
Debtor. )

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JOHN QUINLAN )  
and )  
OMAR KHAWAJA )  
and )  
OSAMA ABDULLATIF, )  
 )  
Plaintiffs, )  
 )  
vs. ) ADVERSARY NO. 23-3141  
 )  
JETALL COMPANIES, INC. )  
and )  
ARABELLA PH 3201 LLC )  
and )  
9201 MEMORIAL DR. LLC )  
and )  
2727 KIRBY 26L LLC )  
and )  
DALIO HOLDINGS I, LLC )  
and )  
DALIO HOLDINGS II, LLC )  
and )  
HOUSTON REAL ESTATE PROPERTIES )  
LLC )  
and )  
SHAHNAZ CHOUDHRI )  
and )  
ALI CHOUDHRI )  
and )  
SHEPHERD-HULDY DEVELOPMENT I, )  
LLC )  
and )  
SHEPHERD-HULDY DEVELOPMENT II, )  
LLC )  
and )  
GALLERIA LOOP NOTE HOLDER LLC )  
and )

Shahnaz Choudhri

November 25, 2024

2 to 5

<p style="text-align: right;">Page 2</p> <p>1 A. KELLY WILLIAMS ) and ) 2 MOUNTAIN BUSINESS CENTER, LLC ) and ) 3 RANDY W. WILLIAMS CH7 TRUSTEE ) and ) 4 OTISCO RDX LLC ) and ) 5 MCITTEE, LLC ) and ) 6 JETALL/CROIX PROPERTIES LP ) and ) 7 JETALL/CROIX GP, LLC, ) 8 Defendants. ) 9 10 ORAL VIDEOTAPED DEPOSITION OF 11 SHAHNAZ CHOUDHRI 12 NOVEMBER 25, 2024 13 14 15 ORAL VIDEOTAPED DEPOSITION OF SHAHNAZ 16 CHOUDHRI, produced as a witness at the instance of the 17 Plaintiffs, and duly sworn, was taken in the 18 above-styled and numbered cause on November 25, 2024, 19 from 11:00 a.m. to 3:36 p.m., Nilda Codina, Notary in 20 and for the State of Texas, recorded by machine 21 shorthand, from Shackelford, McKinley &amp; Norton, LLP, 22 located at 717 Texas Avenue, 27th Floor, Houston, 23 Texas, 77002, pursuant to the Federal Rules of Civil 24 Procedure, and the provisions stated on the record or 25 attached hereto.</p>	<p style="text-align: right;">Page 4</p> <p>1 I-N-D-E-X 2 3 PAGE 4 Appearances.....2 5 SHAHNAZ CHOUDHRI 6 Direct Examination by Mr. Ballases.....13 7 Proceedings concluded.....191 8 Witness Signature/errata.....192 9 Reporter's certificate.....194 10 E-X-H-I-B-I-T-S 11 PAGE 12 Exhibit No. 30 Frost Bank statement.....101 13 Exhibit No. 31 Account Select Form Notice.....103 14 Exhibit No. 32 Wire transfers.....105 15 Exhibit No. 33 Bank(JP Morgan).....127 16 Exhibit No. 34 Franchise Tax Report.....130 17 Exhibit No. 35 Checks(Frost Bank).....142 18 Exhibit No. 36 Certificate of formation.....157 19 Exhibit No. 37 Frost Bank Statements.....176 20 21 22 23 24 25</p>
<p style="text-align: right;">Page 3</p> <p>1 A-P-P-E-A-R-A-N-C-E-S 2 FOR THE PLAINTIFF: 3 4 Mr. Michael Ballases, Esq. 5 HOOVER SLOVACEK, LLP 6 5051 Westheimer Road 7 Suite 1200 8 Houston, TX 77056 9 Phone (713)977-8686 10 Fax (713)977-5395 11 ballases@hooverslovacek.com 12 13 FOR THE DEFENDANT: 14 15 Ms. Lori Hood, Esq. 16 SHACKELFORD 17 717 Texas Avenue 27th Floor 18 Houston, TX 77002 19 Phone (832)669-6081 20 lhood@shackelford.law 21 22 ALSO PRESENT: Pamela Longoria, Videographer; Beth 23 Mendez, Ali Choudhri 24 25</p>	<p style="text-align: right;">Page 5</p> <p>1 P-R-O-C-E-E-D-I-N-G-S 2 THE VIDEOGRAPHER: We are now on the 3 record at 11:25 a.m. Counsel, will you please state 4 your appearances for the record. 5 MR. BALLASES: Michael Ballases for 6 the plaintiffs Omar Khawaja, Osama Abdullatif and John 7 Quinlan. 8 MS. HOOD: And Lori Hood for 9 Mrs. Choudhri. 10 MR. CHOUDHRI: And Ali Choudhri. 11 MS. HOOD: And who is this? 12 MS. MENDEZ: Beth Mendez with Osama 13 Abdullatif. 14 MR. CHOUDHRI: You're with Osama 15 Abdullatif? 16 MS. HOOD: Wait, wait, wait. 17 MR. BALLASES: Yeah, Beth Mendez, she 18 works with Osama. 19 MS. HOOD: She works for him, but does 20 -- he's a party in his individual capacity. So is she 21 his left arm, right arm? 22 MR. BALLASES: Right. She's his right 23 arm. 24 MS. HOOD: Okay. And so can I depose 25 her later?</p>

<p style="text-align: right;">Page 6</p> <p>1 MR. BALLASES: If we -- if she's put</p> <p>2 on a list of people who have relevant knowledge of the</p> <p>3 case, maybe. If not, no --</p> <p>4 MS. HOOD: How do you spell -- how do</p> <p>5 you spell your last name?</p> <p>6 MS. MENDEZ: M-E-N-D-E-Z.</p> <p>7 MS. HOOD: And what do you do for</p> <p>8 Mr. Abdullatif?</p> <p>9 MR. BALLASES: All right. You're not</p> <p>10 answering anymore questions.</p> <p>11 MS. HOOD: Well, I object to her being</p> <p>12 here. She's not a party, she's not a party rep. An</p> <p>13 individual can't have a party rep, as you know, so I'm</p> <p>14 going to object to her being here.</p> <p>15 MR. BALLASES: Okay.</p> <p>16 MS. HOOD: I look forward to deposing</p> <p>17 her.</p> <p>18 MR. BALLASES: Okay.</p> <p>19 MR. CHOUDHRI: So, Mr. Ballases, as</p> <p>20 you know, she showed up in front of Judge Robinson, and</p> <p>21 Judge Robinson kicked her out of the hearing because</p> <p>22 she's not a party. So I'm objecting to her being here.</p> <p>23 She should not be here. She's not a party</p> <p>24 representative. There -- Osama Abdullatif is an</p> <p>25 individual. He's not here. She can't be here. So I'm</p>	<p style="text-align: right;">Page 8</p> <p>1 MR. BALLASES: Can -- can you stop?</p> <p>2 Can you stop?</p> <p>3 MR. CHOUDHRI: You just said -- so</p> <p>4 Ms. -- Ms. Mendez, who are you here on behalf of?</p> <p>5 MR. BALLASES: You don't have to</p> <p>6 answer any questions.</p> <p>7 Okay.</p> <p>8 MR. CHOUDHRI: You can't just have</p> <p>9 people in a deposition, Mr. Ballases, --</p> <p>10 THE REPORTER: I have to swear her in.</p> <p>11 MR. BALLASES: Okay. Swear her in.</p> <p>12 MR. CHOUDHRI: You can't just have</p> <p>13 people in a deposition who crash a deposition. It</p> <p>14 doesn't work that way.</p> <p>15 MR. BALLASES: Is that what law school</p> <p>16 taught you?</p> <p>17 MS. HOOD: Okay.</p> <p>18 MR. CHOUDHRI: Please don't be smart.</p> <p>19 MS. HOOD: He's right about the rules</p> <p>20 and you know that and so, yeah, we'll complain to the</p> <p>21 Judge and --</p> <p>22 MR. CHOUDHRI: Whether you're a lawyer</p> <p>23 or you're not, you have to follow the rules.</p> <p>24 MR. BALLASES: Right. You can file</p> <p>25 whatever objection you want.</p>
<p style="text-align: right;">Page 7</p> <p>1 objecting to her being here.</p> <p>2 So to move forward with this</p> <p>3 deposition, I would ask that she not be part -- a party</p> <p>4 to this deposition since she's not a party.</p> <p>5 MR. BALLASES: Okay. Well, she's</p> <p>6 assisting me, so I appreciate your objection --</p> <p>7 MR. CHOUDHRI: Does she -- does she</p> <p>8 work for you --</p> <p>9 MR. BALLASES: -- it's noted on the</p> <p>10 record. It's noted on the record and you can do it.</p> <p>11 MR. CHOUDHRI: -- does she work for</p> <p>12 you -- is she your paralegal?</p> <p>13 MR. BALLASES: Okay.</p> <p>14 MR. CHOUDHRI: Mr. Ballases, --</p> <p>15 MR. BALLASES: This is not my</p> <p>16 deposition. Can we just get this over with? Okay.</p> <p>17 You made your objection. You can file whatever you'd</p> <p>18 like with the Court.</p> <p>19 MR. CHOUDHRI: Mr. Ballases, what</p> <p>20 grounds is she here? She's -- she's a paralegal for</p> <p>21 Hoover Slovacek?</p> <p>22 MR. BALLASES: No. That's not what I</p> <p>23 said. She's assisting me today.</p> <p>24 MR. CHOUDHRI: Is she -- is she -- is</p> <p>25 she your legal assistant for Hoover Slovacek?</p>	<p style="text-align: right;">Page 9</p> <p>1 MS. HOOD: And -- and --</p> <p>2 MR. CHOUDHRI: Let's -- let's take a</p> <p>3 break and call the Judge. No, I want --</p> <p>4 MS. HOOD: No, no, no. I want to get</p> <p>5 this over with. I want to get this over with as does</p> <p>6 my client.</p> <p>7 MR. CHOUDHRI: So just so I'm clear,</p> <p>8 Mr. Ballases, you're refusing to exclude Beth Mendez?</p> <p>9 You're going to -- you're insisting she stay in the</p> <p>10 room and you're -- you're objecting to her leaving.</p> <p>11 You're refusing to have her leave this room; is that</p> <p>12 correct?</p> <p>13 MR. BALLASES: All right. You've</p> <p>14 stated your objection to the record. She's assisting</p> <p>15 me today in the deposition. If you feel like you need</p> <p>16 to file something with court, then please do so.</p> <p>17 MR. CHOUDHRI: Is she a legal</p> <p>18 assistant to Hoover Slovacek?</p> <p>19 MR. BALLASES: This isn't my</p> <p>20 deposition, Mr. Choudhri.</p> <p>21 MR. CHOUDHRI: What right does she</p> <p>22 have to be here --</p> <p>23 MS. HOOD: It is, actually.</p> <p>24 MR. CHOUDHRI: -- what right does she</p> <p>25 have to be here?</p>

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10 to 13

<p style="text-align: right;">Page 10</p> <p>1 MR. BALLASES: There's a time --</p> <p>2 because you didn't go to law school, you don't know how</p> <p>3 this works. There's a time and place to argue this.</p> <p>4 You stated your objection on the record, and I</p> <p>5 appreciate that. We can take it up later with the</p> <p>6 Judge. Now is not the time to argue it. There's no</p> <p>7 Judge here.</p> <p>8 MR. CHOUDHRI: Mr. Ballases, well --</p> <p>9 well, then I want to state right now -- Ms. Mendez --</p> <p>10 Ms. Mendez, you're refusing to leave, right; is that</p> <p>11 correct?</p> <p>12 MR. BALLASES: She's helping me so,</p> <p>13 no, I want her here.</p> <p>14 MR. CHOUDHRI: You want her here?</p> <p>15 MR. BALLASES: Yes.</p> <p>16 MR. CHOUDHRI: And she's not a</p> <p>17 paralegal for you. She's not your legal assistant.</p> <p>18 She does not work for Hoover Slovacsek. Just say it on</p> <p>19 the record.</p> <p>20 MR. BALLASES: Do you want Ms. -- do</p> <p>21 you want Ms. Choudhri to finish her deposition or not?</p> <p>22 MR. CHOUDHRI: Say it on the record.</p> <p>23 Is she a legal assistant for Hoover Slovacsek?</p> <p>24 MR. BALLASES: She's assisting me</p> <p>25 today.</p>	<p style="text-align: right;">Page 12</p> <p>1 is clear, in this room, I'd like the court reporter</p> <p>2 just to make sure we take an account of who's in this</p> <p>3 room: Omar Khawaja, the party; John Quinlan, the</p> <p>4 party; Osama Abdullatif, the party are not present.</p> <p>5 The only person who's here present is</p> <p>6 Michael Ballases, the attorney for them and Beth</p> <p>7 Mendez, who is an assistant of Osama Abdullatif, who is</p> <p>8 not present. I just want the record to reflect</p> <p>9 clearly.</p> <p>10 MR. BALLASES: Good job.</p> <p>11 MR. CHOUDHRI: Is that -- is that</p> <p>12 clear? Is the record clear, Mr. Ballases?</p> <p>13 MR. BALLASES: The record's clear,</p> <p>14 good job.</p> <p>15 MR. CHOUDHRI: No, it's not about</p> <p>16 being good job or not. I just want to make sure. Is</p> <p>17 there anybody else in this room that I failed to</p> <p>18 mention besides the deponent, Ms. Hood, the court</p> <p>19 reporter and the videographer?</p> <p>20 MS. HOOD: You've got it covered.</p> <p>21 MR. BALLASES: I mean, unless</p> <p>22 someone's hiding in the corner, I think you've</p> <p>23 identified everybody --</p> <p>24 MS. HOOD: Okay. I think we have it</p> <p>25 covered. I also would like to say that my client's</p>
<p style="text-align: right;">Page 11</p> <p>1 THE WITNESS: No. He is right. I</p> <p>2 agree with him.</p> <p>3 MR. BALLASES: Okay.</p> <p>4 MR. CHOUDHRI: No, no, I'm not -- it's</p> <p>5 fine.</p> <p>6 Mr. Ballases, you can't have</p> <p>7 Ms. Mendez sitting here. She is a representative of</p> <p>8 Osama Abdullatif. There is no LLC, Osama Abdullatif.</p> <p>9 Okay. Who are the parties in this case --</p> <p>10 MR. BALLASES: Thank you for</p> <p>11 stating -- thank you for stating your objection on the</p> <p>12 record.</p> <p>13 MR. CHOUDHRI: Who are the parties</p> <p>14 you're representing?</p> <p>15 MR. BALLASES: Can you swear the</p> <p>16 witness in, please?</p> <p>17 MS. HOOD: Okay. Whoa, whoa, whoa.</p> <p>18 MR. CHOUDHRI: Wait.</p> <p>19 MS. HOOD: She doesn't work for him.</p> <p>20 Okay. It's been made clear. She works for Osama.</p> <p>21 She's sitting here because apparently he's too busy to</p> <p>22 actually come to a deposition, and I look forward to</p> <p>23 deposing her and she's got no privilege. Okay. So</p> <p>24 there we go.</p> <p>25 MR. CHOUDHRI: And just so the record</p>	<p style="text-align: right;">Page 13</p> <p>1 been here since 11:00 o'clock. It's now 11:30, so</p> <p>2 let's get on with it.</p> <p>3 MR. BALLASES: Agree.</p> <p>4 MS. HOOD: And your people were late,</p> <p>5 not us, so.</p> <p>6 MR. BALLASES: I understand because</p> <p>7 we're accommodating you to have your deposition here</p> <p>8 despite the fact that the Court ordered it at the</p> <p>9 courthouse.</p> <p>10 MS. HOOD: Oh, always play the victim.</p> <p>11 Okay. Keep going.</p> <p>12 MR. CHOUDHRI: The deposition was</p> <p>13 supposed to --</p> <p>14 MR. BALLASES: Can you swear her in.</p> <p>15 MR. CHOUDHRI: -- start at 10:00 a.m.</p> <p>16 You wanted to start at 11:00 a.m., and you showed up 30</p> <p>17 minutes late to this deposition.</p> <p>18 MR. BALLASES: Can you please swear</p> <p>19 her in.</p> <p>20 SHAHNAZ CHOUDHRI,</p> <p>21 Having been first duly sworn, was examined and</p> <p>22 testified as follows:</p> <p>23 DIRECT EXAMINATION</p> <p>24 BY MR. BALLASES:</p> <p>25 Q. (BY MR. BALLASES:) Hi, Ms. Choudhri, how are</p>

<p style="text-align: right;">Page 14</p> <p>1 you today?</p> <p>2 A. Yes, I'm fine.</p> <p>3 Q. Good. Are you looking forward to</p> <p>4 Thanksgiving?</p> <p>5 A. Yes.</p> <p>6 Q. Me too.</p> <p>7 A. But I was ready for two weeks. Since last</p> <p>8 depo, after that, I was really sick.</p> <p>9 Q. Well, I hope you feel better now. Do you</p> <p>10 feel better today?</p> <p>11 A. Yeah. And I have move -- remove from the</p> <p>12 house. It was terrible.</p> <p>13 Q. Okay. Well, I'm glad you feel better.</p> <p>14 So we're here for the continuation of your</p> <p>15 deposition. We've gone through a lot of this stuff, so</p> <p>16 that's good. That should make this go faster. Do you</p> <p>17 recall all the rules and stuff we talked about the last</p> <p>18 time, or would you like me to go over them again?</p> <p>19 A. I don't know. Whatever you feel. You are</p> <p>20 attorney, you know better. I can do as less than</p> <p>21 anyone.</p> <p>22 Q. Sure.</p> <p>23 A. I need from the point. I don't want to go</p> <p>24 for long.</p> <p>25 Q. Yeah, sure. So I understand. So then I'll</p>	<p style="text-align: right;">Page 16</p> <p>1 document titled "Notice of Federal Tax Lien" and it</p> <p>2 looks like it was recorded in March of 2018; do you see</p> <p>3 that?</p> <p>4 A. Yes.</p> <p>5 Q. Okay. And this document says that there is a</p> <p>6 federal tax lien against yourself, Shahnaz Choudhri; is</p> <p>7 that right?</p> <p>8 A. Yes.</p> <p>9 Q. Okay. And it lists amount owed as</p> <p>10 \$7,442,907.78; do you see that?</p> <p>11 A. Yes.</p> <p>12 Q. Okay. Can you tell me, as you sit here</p> <p>13 today, what -- from where the income that generated</p> <p>14 this liability came from?</p> <p>15 A. But I -- I already cleared this one. There's</p> <p>16 no any problem on this one.</p> <p>17 Q. You're 100 percent right and I've got the</p> <p>18 release, and we're going to go over that, but I have</p> <p>19 some questions before we get to that. So you're right</p> <p>20 on that, but my question's a little bit different.</p> <p>21 My question is, the government, the federal</p> <p>22 government, said you had a seven million four hundred</p> <p>23 some-odd thousand, or some-odd million-dollar tax</p> <p>24 liability.</p> <p>25 And my question is, where did the -- did you</p>
<p style="text-align: right;">Page 15</p> <p>1 do a refresher real quick. So to make this progress</p> <p>2 smoother, I'm going to be asking you questions.</p> <p>3 Sometimes you'll anticipate my question, and you will</p> <p>4 know what my question is. If you could wait until I</p> <p>5 finish my whole question before you answer it, that</p> <p>6 would be helpful. I will try to give you the same</p> <p>7 courtesy when you're answering a question. I will try</p> <p>8 not to ask my next question until you're done; is that</p> <p>9 fair?</p> <p>10 A. It's fair.</p> <p>11 Q. Okay. And you're doing great so far, but we</p> <p>12 want an answer with yeses, noes, or explanations if you</p> <p>13 need to explain something. What we don't want an</p> <p>14 answer with is nods or shakes of the heads or "uh-huhs"</p> <p>15 or "huh-uhs" because those are hard for the court</p> <p>16 reporter to write down.</p> <p>17 A. Yes, I agree.</p> <p>18 Q. Okay. Okay. Let's jump in. If you can turn</p> <p>19 to Exhibit 2 in this notebook.</p> <p>20 So Exhibits 1 through 29 are in front of you</p> <p>21 and they are from the first deposition. They've been</p> <p>22 placed in a nice notebook for you.</p> <p>23 Exhibit 2 is right there.</p> <p>24 A. I'm sorry.</p> <p>25 Q. That's okay. Okay. So Exhibit 2 is -- is a</p>	<p style="text-align: right;">Page 17</p> <p>1 derive the income that generated this tax liability?</p> <p>2 A. I don't know.</p> <p>3 Q. Okay. Because if I recall from your last</p> <p>4 deposition, you told me that after the first couple of</p> <p>5 years of working with your husband around 2000, you</p> <p>6 didn't do anymore work after that?</p> <p>7 A. Yes.</p> <p>8 Q. That's correct?</p> <p>9 A. Yes.</p> <p>10 Q. Okay. So in the years 2007, 2008, 2009,</p> <p>11 2010, 2011, you were -- you were not working at those</p> <p>12 times, correct?</p> <p>13 A. I don't know.</p> <p>14 Q. Okay. But you remember that you only worked</p> <p>15 with your husband for two to three years earlier --</p> <p>16 A. I don't remember.</p> <p>17 Q. Okay. If you can let me finish my</p> <p>18 question --</p> <p>19 A. Because it was a long time, I don't remember.</p> <p>20 Q. Yeah, I understand that. So if you can let</p> <p>21 me finish my question. So the reason being is, when</p> <p>22 she types down everything, it will say half a question</p> <p>23 and then an answer and then half --</p> <p>24 A. Okay. Okay.</p> <p>25 Q. Okay. So wait until I finish, please.</p>

<p style="text-align: right;">Page 18</p> <p>1 Okay. So if you turn to Exhibit 3 in the</p> <p>2 notebook, the next one. Tab three, there you go.</p> <p>3 Okay. So this is the release that you made reference</p> <p>4 to. Exhibit 3 to your deposition is titled</p> <p>5 "Certificate of Release of Federal Tax Lien"; do you</p> <p>6 see that?</p> <p>7 A. Yes.</p> <p>8 Q. Okay. And it looks like it was recorded in</p> <p>9 October of 2020?</p> <p>10 A. Okay.</p> <p>11 Q. Okay. And this releases your tax liability</p> <p>12 referenced in Exhibit 2?</p> <p>13 A. Yes.</p> <p>14 Q. Okay. Do you -- do you recall who paid to</p> <p>15 get -- who paid the IRS to get this lien released?</p> <p>16 A. I don't know.</p> <p>17 Q. Okay. If you turn to Exhibit 4, there you</p> <p>18 go. If you turn to Exhibit 4 of your deposition, it is</p> <p>19 a check written to the United States Treasury in the</p> <p>20 amount of \$204,168; do you see that?</p> <p>21 A. Yes.</p> <p>22 Q. Okay. And that check was written by Galleria</p> <p>23 Loop Note Holder, LLC?</p> <p>24 A. I don't remember.</p> <p>25 Q. Right. But if you look at the top right of</p>	<p style="text-align: right;">Page 20</p> <p>1 Q. Okay. Could you turn to Exhibit 5 in your</p> <p>2 deposition, please.</p> <p>3 Okay. So Exhibit 5 to your deposition is a</p> <p>4 document titled "Agency Agreement"; do you see that?</p> <p>5 A. Uh-huh.</p> <p>6 Q. Okay. And this agency agreement is between,</p> <p>7 if you look in that very first paragraph at the top, it</p> <p>8 says "This agency agreement is effective as of the 18th</p> <p>9 of December 2022 by and between Shahnaz Choudhri,</p> <p>10 principal and Drew G. Dennet"; do you see that?</p> <p>11 A. Yes.</p> <p>12 Q. Right at the top. And if you turn to the</p> <p>13 second to last page which is Bates labeled BRIDGECO 76.</p> <p>14 And I can help you with that. There you go.</p> <p>15 Okay. Is that your signature on -- on this</p> <p>16 page, BRIDGECO 76?</p> <p>17 A. I don't remember.</p> <p>18 Q. You don't remember -- so your signature</p> <p>19 appears on that page. Do you know if that's your</p> <p>20 signature?</p> <p>21 A. Yes, I know. But I don't remember it.</p> <p>22 Q. Right. So if I understand what you're</p> <p>23 saying, you're telling me that that is your signature,</p> <p>24 but you don't remember signing it?</p> <p>25 A. No. Because now because of my health, I'm</p>
<p style="text-align: right;">Page 19</p> <p>1 the check, you can see the check, it says "Galleria</p> <p>2 Loop Note Holder, LLC"; do you see that?</p> <p>3 A. Yes.</p> <p>4 Q. Okay. And you can see it references your</p> <p>5 name in the bottom left-hand corner of the check; do</p> <p>6 you see that?</p> <p>7 A. Uh-huh.</p> <p>8 Q. Okay. Do -- was this -- do you have a</p> <p>9 recollection of whether this payment that's reflected</p> <p>10 in Exhibit 4 was the payment that was made to obtain a</p> <p>11 release of your tax lien?</p> <p>12 A. I don't know.</p> <p>13 Q. Okay. Do you remember negotiating with the</p> <p>14 IRS about the tax lien?</p> <p>15 A. I don't know.</p> <p>16 Q. Okay. Did you ever talk with the IRS about</p> <p>17 the tax lien?</p> <p>18 A. No.</p> <p>19 Q. Okay. Other people handled that?</p> <p>20 A. I don't remember.</p> <p>21 Q. Okay. And I think you answered this in the</p> <p>22 other deposition, but I want to make sure.</p> <p>23 So you never lent any money to Galleria Loop</p> <p>24 Note Holder, LLC, did you?</p> <p>25 A. I don't remember.</p>	<p style="text-align: right;">Page 21</p> <p>1 telling you I'm taking the medicine (phonetic)</p> <p>2 Metamind. It is really strong medicine. I have lose</p> <p>3 lot of memories.</p> <p>4 Q. Okay. And that was the same medicine I think</p> <p>5 you told me about at the last deposition?</p> <p>6 A. Yeah, actually this is -- this is hurting,</p> <p>7 that's why last time I couldn't -- couldn't make it.</p> <p>8 Not because I was sick, because of this reason.</p> <p>9 Q. Okay. The medicine made you sick you're</p> <p>10 saying from last time.</p> <p>11 A. Not medicine. Because it's stress and I have</p> <p>12 bad -- my illness and I was not feeling good since a</p> <p>13 month and I'm under this and I don't remember a lot of</p> <p>14 things.</p> <p>15 Q. That's okay.</p> <p>16 A. So -- some, so little bit I know, but mostly</p> <p>17 I don't remember.</p> <p>18 Q. That's okay. If you don't remember, all you</p> <p>19 can do is tell me the truth and if the truth is you</p> <p>20 don't remember, that's fine.</p> <p>21 A. Okay.</p> <p>22 Q. Okay. So if you turn to the last page of</p> <p>23 this document, it's Bates labeled BRIDGECO 77. It</p> <p>24 lists several investment properties; do you see that?</p> <p>25 A. Yes.</p>

<p style="text-align: right;">Page 22</p> <p>1 Q. Okay. So I guess if I understand your</p> <p>2 testimony correctly today, as far as Exhibit 5, you</p> <p>3 don't recall signing this?</p> <p>4 A. I don't know.</p> <p>5 Q. Okay. Do you have a recollection of signing</p> <p>6 Exhibit 5?</p> <p>7 A. I don't remember.</p> <p>8 Q. Okay. That's fine. And can you tell the</p> <p>9 Judge or Jury or Judge Norman why someone would sign an</p> <p>10 agency agreement like this? Do you have any idea?</p> <p>11 A. I don't have any idea.</p> <p>12 Q. Okay. Do you have a recollection of somebody</p> <p>13 asking you to sign this document?</p> <p>14 A. I don't know.</p> <p>15 Q. Okay. Are there ever -- are there ever</p> <p>16 instances where -- be it your son or someone else says,</p> <p>17 hey, will you please sign this document?</p> <p>18 A. Nobody told me.</p> <p>19 Q. No one told you that you can remember. Does</p> <p>20 that ever happen just as a matter of practice?</p> <p>21 A. I don't remember.</p> <p>22 Q. Yeah, okay. As you sit here today,</p> <p>23 Ms. Choudhri, do you have a recollection of a company</p> <p>24 called Skaneateles RDX, LLC?</p> <p>25 A. I don't know. I don't remember at all.</p>	<p style="text-align: right;">Page 24</p> <p>1 Q. This document, if you look at the bottom,</p> <p>2 it's dated March 19th, 2024, so that was just a few</p> <p>3 months ago, correct?</p> <p>4 A. Yes.</p> <p>5 Q. Okay.</p> <p>6 MR. CHOUDHRI: Mr. Ballases, do you</p> <p>7 have a copy of the exhibits for me as well?</p> <p>8 MR. BALLASES: No. They were produced</p> <p>9 at the last deposition.</p> <p>10 MR. CHOUDHRI: I'm a party, as you</p> <p>11 know, and so you should at least have a copy for me at</p> <p>12 this deposition.</p> <p>13 MR. BALLASES: So --</p> <p>14 MR. CHOUDHRI: Is there a reason you</p> <p>15 don't want to give me a copy of it or --</p> <p>16 MR. BALLASES: Yeah. So they're</p> <p>17 already produced at the first deposition. The court</p> <p>18 reporter just brought those exhibits back. So if you</p> <p>19 didn't bring your exhibits, I'm sorry.</p> <p>20 MR. CHOUDHRI: So you're -- you don't</p> <p>21 feel you need to give all the parties copies of the</p> <p>22 deposi- -- copies of the exhibits as you're asking</p> <p>23 questions?</p> <p>24 MR. BALLASES: Objection, sidebar.</p> <p>25 MR. CHOUDHRI: You don't think</p>
<p style="text-align: right;">Page 23</p> <p>1 Q. Okay.</p> <p>2 A. I don't know what is it, I don't know.</p> <p>3 Q. Okay. So you have no have recollection of a</p> <p>4 company called Skaneateles RDX --</p> <p>5 A. No, I don't know.</p> <p>6 Q. Okay. Do you have a recollection of a</p> <p>7 company called Otisco RDX, LLC?</p> <p>8 A. No.</p> <p>9 Q. Okay. Did you ever do any work for either of</p> <p>10 those two companies?</p> <p>11 A. Never.</p> <p>12 Q. Did you ever get money from those two</p> <p>13 companies?</p> <p>14 A. I don't know.</p> <p>15 Q. Did you ever loan money to those two</p> <p>16 companies?</p> <p>17 A. I don't know.</p> <p>18 Q. Okay. You have no recollection of any of</p> <p>19 those things, though, do you?</p> <p>20 A. I don't remember.</p> <p>21 Q. Could you turn to Exhibit 8. There you go.</p> <p>22 Exhibit 8 to your deposition is a document titled</p> <p>23 "Application For Reinstatement and Request to Set Aside</p> <p>24 Revocation or Forfeiture"; do you see that at the top?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 25</p> <p>1 that's -- that's proper at all?</p> <p>2 Q. (BY MR. BALLASES:) So if you look at --</p> <p>3 MR. CHOUDHRI: Mr. Ballases?</p> <p>4 Q. (BY MR. BALLASES:) -- if you look at the</p> <p>5 bottom of Exhibit 8, it says -- it's got an E-signature</p> <p>6 and it says "President of Manager." I'm guessing it's</p> <p>7 supposed to be President or Manager, but it says</p> <p>8 "schoudhri"; do you see that?</p> <p>9 A. Uh-huh.</p> <p>10 Q. Okay. Do you have a recollection of</p> <p>11 authorizing this particular document found in Exhibit 8</p> <p>12 to be filed?</p> <p>13 A. I don't know about anything.</p> <p>14 Q. Okay. Is there anyone else in your family</p> <p>15 who would go by the initial "schoudhri" besides</p> <p>16 yourself?</p> <p>17 A. No, nobody. I don't involve any family.</p> <p>18 Q. Okay.</p> <p>19 MR. CHOUDHRI: I want to object to</p> <p>20 this, Mr. Ballases, that you're not handing me any of</p> <p>21 the exhibits and I'm a party in this deposition.</p> <p>22 Mr. Ballases, do you have a -- do you</p> <p>23 have any exhibits to hand me? Are you not willing to</p> <p>24 share the exhibits with me?</p> <p>25 MR. BALLASES: You've made your</p>



<p style="text-align: right;">Page 26</p> <p>1 objection on the record. You can stop now.</p> <p>2 MR. CHOUDHRI: But you're not willing</p> <p>3 to share any exhibits?</p> <p>4 MR. BALLASES: I don't have copies.</p> <p>5 They were brought to the first deposition that you</p> <p>6 attended. Everyone got copies then.</p> <p>7 MR. CHOUDHRI: I never got copies of</p> <p>8 the first deposition. You never gave me copies --</p> <p>9 MR. BALLASES: Sorry.</p> <p>10 MR. CHOUDHRI: -- and you're not</p> <p>11 giving me copies again. So you think it's okay that</p> <p>12 I'm a party and you don't give me copies of the</p> <p>13 exhibits?</p> <p>14 MR. BALLASES: Yeah. If you can cite</p> <p>15 a rule that says I have to give you exhibits, then tell</p> <p>16 me. If not, then you can just be quiet. All right?</p> <p>17 Q. (BY MR. BALLASES:) I'm going to now direct</p> <p>18 you to Exhibit 10.</p> <p>19 A. Be patient.</p> <p>20 Q. I will, I apologize. Exhibit --</p> <p>21 A. You have to respect each other.</p> <p>22 Q. Fair enough. So Exhibit 10 to your</p> <p>23 deposition is a document titled "Application for</p> <p>24 Reinstatement and Request to Set Aside Revocation or</p> <p>25 Forfeiture," but this time it's for Otisco; do you see</p>	<p style="text-align: right;">Page 28</p> <p>1 A. Yes, I can see.</p> <p>2 Q. Okay. And the -- the "Beneficiary" is</p> <p>3 "Skaneateles, RDX, LLC"; do you see that?</p> <p>4 A. Yes.</p> <p>5 Q. Okay. And it references -- it says a little</p> <p>6 bit beneath that, it says "Promissory Note: As</p> <p>7 provided by Note"; do you see that?</p> <p>8 A. Yes, I can see.</p> <p>9 Q. Do you have -- and the date of this document</p> <p>10 is September 25th of 2022, yes?</p> <p>11 A. Yes, I don't know what is it.</p> <p>12 Q. Okay. So as you sit here today, do you have</p> <p>13 any recollection of Skaneateles loaning money to</p> <p>14 Houston Real Estate Properties?</p> <p>15 A. I don't remember.</p> <p>16 Q. Okay. Did anyone -- did you as the President</p> <p>17 or Manager of Skaneateles authorize this document to be</p> <p>18 entered into?</p> <p>19 A. No, I don't know.</p> <p>20 Q. Okay. Did you as the president or manager of</p> <p>21 Skaneateles ever instruct Skaneateles to loan any money</p> <p>22 to Houston Real Estate Properties, LLC?</p> <p>23 A. Yes, I don't recognize this one.</p> <p>24 Q. Okay. And if you turn to the back, the</p> <p>25 second to last page, I believe. It looks like it's</p>
<p style="text-align: right;">Page 27</p> <p>1 that?</p> <p>2 A. Yes.</p> <p>3 Q. Okay. And this document was also filed on</p> <p>4 March 19th of 2024?</p> <p>5 A. Yes, I can see.</p> <p>6 Q. Okay. And, again, it says "President of</p> <p>7 Manager." I'm guessing that means president or</p> <p>8 manager, but it says it's an E-signature and it says by</p> <p>9 "schoudhri"; do you see that?</p> <p>10 A. Yes, I can see, but I don't know about it.</p> <p>11 Q. That's okay. So if I understand your</p> <p>12 testimony correctly today, what you're saying is, you</p> <p>13 don't have a recollection of authorizing this document</p> <p>14 to be filed?</p> <p>15 A. I don't remember.</p> <p>16 Q. Okay. Okay. If you can turn to Exhibit 11.</p> <p>17 Exhibit 11 to your deposition is a -- it's titled "Deed</p> <p>18 of Trust and Security Agreement"; do you see that?</p> <p>19 A. Yes.</p> <p>20 Q. Okay. And this says the "Grantor" at the top</p> <p>21 is -- I'll give you a second to put your glasses on.</p> <p>22 A. Please.</p> <p>23 Q. Sure. Okay. So this says at the "Grantor"</p> <p>24 of this document is "Houston Real Estate Properties,</p> <p>25 LLC"; do you see that?</p>	<p style="text-align: right;">Page 29</p> <p>1 signed by -- I can help you. Here you go.</p> <p>2 So if you turn to the second to last page of</p> <p>3 -- of Exhibit 11, it looks like it's signed by Houston</p> <p>4 Real Estate Properties by Dward Darjeau; do you</p> <p>5 recognize that name?</p> <p>6 A. Yes.</p> <p>7 Q. Who's Dward Darjeau?</p> <p>8 A. He's working for office for a long -- long</p> <p>9 time ago, but I don't remember what is this.</p> <p>10 Q. Okay. Did he ever work for you?</p> <p>11 A. Not for me. I'm not working.</p> <p>12 Q. Okay. I just want to make sure.</p> <p>13 Do you have any recollection of doing any</p> <p>14 work for or with Houston Real Estate Properties, LLC?</p> <p>15 A. No, I don't know. I don't remember.</p> <p>16 Q. If you would have done work with or for that</p> <p>17 company, that would have been way back at the beginning</p> <p>18 that we talked about with your husband the first two or</p> <p>19 three years early, correct?</p> <p>20 A. No, I don't know.</p> <p>21 Q. Okay. When do you think -- strike that.</p> <p>22 And I think you answered this, but just to be</p> <p>23 clear. So you don't have a recollection of ever doing</p> <p>24 any business with or for Houston Real Estate</p> <p>25 Properties?</p>



<p style="text-align: right;">Page 30</p> <p>1 A. I don't remember.</p> <p>2 Q. Okay.</p> <p>3 A. There's a lot of paperwork I don't want to</p> <p>4 follow this everything for long time.</p> <p>5 Q. I understand.</p> <p>6 Do you know who Scarlet MacGeorge is?</p> <p>7 A. No.</p> <p>8 Q. Was -- if you are the manager or president of</p> <p>9 Skaneateles, did you ever authorize Scarlet MacGeorge</p> <p>10 to sign documents on behalf of --</p> <p>11 A. No.</p> <p>12 Q. -- Skaneateles RDX, LLC?</p> <p>13 MS. HOOD: Let him -- let him finish</p> <p>14 asking his question.</p> <p>15 THE WITNESS: Okay.</p> <p>16 Q. (BY MR. BALLASES:) So if you turn to Exhibit</p> <p>17 14, please. Right there. There you go.</p> <p>18 So Exhibit 14 is a "Proof of Claim" that was</p> <p>19 filed by Skaneateles RDX. Do you see that under Box</p> <p>20 No. 1?</p> <p>21 A. Uh-huh.</p> <p>22 Q. Okay. And if you look on the last page, it's</p> <p>23 got an E-signature -- yeah, last page. There you go.</p> <p>24 So if you look on the last page, it has an</p> <p>25 E-signature and it says "Scarlet MacGeorge" and it</p>	<p style="text-align: right;">Page 32</p> <p>1 So Exhibit 16 to your deposition are bank</p> <p>2 statements at Bancorp South for an account that</p> <p>3 yourself and Mr. Ali Choudhri have at that bank; do you</p> <p>4 see that?</p> <p>5 A. Yes.</p> <p>6 Q. Okay. And are you familiar -- and you may</p> <p>7 not know this because this isn't common knowledge, but</p> <p>8 so BankCorp South, Cadence Bank, and Icon are all the</p> <p>9 same bank; do you know that or no? And it's okay if</p> <p>10 you don't.</p> <p>11 A. No, I don't know.</p> <p>12 Q. Okay. Well, so this bank statement is for</p> <p>13 BankCorp South and you can see the statement date is</p> <p>14 January 21st of 2022. Do you see that at the top</p> <p>15 right?</p> <p>16 A. Yes, I can see.</p> <p>17 Q. Okay. And the account number is "0076620";</p> <p>18 do you see that?</p> <p>19 A. Yes, but I don't -- I don't remem- -- check</p> <p>20 all my statement. And I don't know which one is on,</p> <p>21 what is going on. I never do.</p> <p>22 Q. Okay. Well let me ask you this: Do you have</p> <p>23 a -- a primary bank that you utilize for day-to-day</p> <p>24 spending?</p> <p>25 A. No.</p>
<p style="text-align: right;">Page 31</p> <p>1 lists her as the Authorized Agent for Skaneateles RDX,</p> <p>2 LLC; do you see that?</p> <p>3 A. Yes.</p> <p>4 Q. You certainly didn't make her the authorized</p> <p>5 agent of Skaneateles, did you?</p> <p>6 A. No.</p> <p>7 Q. Okay. And I notice it says email address, it</p> <p>8 says "legal@jetallcompanies.com"; do you see that?</p> <p>9 A. I don't know about that.</p> <p>10 Q. And if you turn to the second page, just one</p> <p>11 page over, I can help you, if you need it.</p> <p>12 Okay. So right there at the top, it says</p> <p>13 that the claim is \$450,000; do you see that?</p> <p>14 A. Yes.</p> <p>15 Q. Okay. And as you sit here today, you've told</p> <p>16 us you don't recall any loan or debt that Houston Real</p> <p>17 Estate Properties owes to Skaneateles, do you?</p> <p>18 A. Yes.</p> <p>19 Q. Do you recall anything?</p> <p>20 A. No.</p> <p>21 Q. Okay. So this 450,000 noted on this proof of</p> <p>22 claim, you have no idea where this number came from?</p> <p>23 A. Yeah, I don't know.</p> <p>24 Q. Okay. We could turn to Exhibit 16, please.</p> <p>25 There you go.</p>	<p style="text-align: right;">Page 33</p> <p>1 Q. Okay. Well, when you need like to go to the</p> <p>2 grocery store, what -- what -- what funds do you</p> <p>3 utilize? Do you have a debit card or how do you --</p> <p>4 A. Credit card.</p> <p>5 Q. Okay. Is the credit card affiliated with a</p> <p>6 particular bank or account?</p> <p>7 A. No.</p> <p>8 Q. What --</p> <p>9 A. Not -- some bank account. Bank -- under some</p> <p>10 bank, but I'm using this one.</p> <p>11 Q. Okay. So which bank is it?</p> <p>12 A. I don't remember.</p> <p>13 Q. Okay. Well, so Exhibit 16, these Bancorp</p> <p>14 South statements, if you look on that very first page,</p> <p>15 it's -- it's Bates stamped BRIDGECO 78 on the very</p> <p>16 first page.</p> <p>17 A. This one?</p> <p>18 Q. Yeah. So if you look down here at the</p> <p>19 bottom, it says "Deposits and other credits" and on</p> <p>20 December 21st of -- I'm going to guess that's 2021, it</p> <p>21 shows a deposit of "\$5,029,527.91" from "Capital Title</p> <p>22 of Texas"; do you see that?</p> <p>23 A. Yes.</p> <p>24 Q. Okay. My question to you is, do you know</p> <p>25 from where these funds originated?</p>

Shahnaz Choudhri  
November 25, 2024

34 to 37

<p style="text-align: right;">Page 34</p> <p>1 A. I don't know.</p> <p>2 Q. Okay. If you turn to -- stay in Exhibit 16,</p> <p>3 please, but if you turn to BRIDGECO 84 -- it's just a</p> <p>4 few pages -- yeah, you got it, a couple of pages over.</p> <p>5 There you go.</p> <p>6 Okay. So BRIDGECO 84, it's got some</p> <p>7 debits -- first of all, this statement is dated March</p> <p>8 21st of 2022. Do you see that at the top right?</p> <p>9 A. Yes.</p> <p>10 Q. Okay. And it's got some debits in this at</p> <p>11 the bottom and one is a \$60,000 payment to "Meandering</p> <p>12 Bend, LLC"; do you recall -- do you see that?</p> <p>13 A. Yes.</p> <p>14 Q. Okay. Can you tell the Judge what that</p> <p>15 payment of monies to Meandering Bend, LLC, has to do</p> <p>16 with?</p> <p>17 A. I don't know.</p> <p>18 Q. Okay.</p> <p>19 A. Because there's so much statements and I</p> <p>20 would do the statement on that time.</p> <p>21 Q. Right. And you told us at that point in time</p> <p>22 in 2022 you weren't working, correct?</p> <p>23 A. No.</p> <p>24 Q. That's correct?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 36</p> <p>1 MR. BALLASES: If you didn't bring</p> <p>2 them with you, I'm sorry if you're not prepared --</p> <p>3 MR. CHOUDHRI: You have not provided</p> <p>4 me -- are you representing here on the record that you</p> <p>5 gave me the exhibits at the last deposition?</p> <p>6 MR. BALLASES: They were produced to</p> <p>7 your parties. So, yes, you got them.</p> <p>8 MR. CHOUDHRI: No, they were not. No,</p> <p>9 they were not.</p> <p>10 MR. BALLASES: Okay.</p> <p>11 MR. CHOUDHRI: Mr. Ballases, are you</p> <p>12 -- is that what you're representing on the record that</p> <p>13 they were produced to all the parties, all the exhibits</p> <p>14 in the deposition were produced to all the parties,</p> <p>15 that's what you're saying?</p> <p>16 MR. BALLASES: They were produced.</p> <p>17 There is a copy the court reporter has. Everybody has</p> <p>18 ordered them.</p> <p>19 MR. CHOUDHRI: No, sir. Mr. Ballases,</p> <p>20 --</p> <p>21 MR. BALLASES: Yeah. I'm not going to</p> <p>22 engage. This isn't proper.</p> <p>23 MR. CHOUDHRI: I'm here in this</p> <p>24 deposition. I'm here in a deposition. I'm a witness</p> <p>25 and I am a party to this case. You're refusing to hand</p>
<p style="text-align: right;">Page 35</p> <p>1 Q. Okay. So certainly you weren't transacting</p> <p>2 business with various LLCs and real estate deals,</p> <p>3 right?</p> <p>4 A. I don't know.</p> <p>5 Q. Well, if you were at home and you weren't</p> <p>6 working, you weren't doing deals then?</p> <p>7 A. Well, I don't know.</p> <p>8 MR. CHOUDHRI: Objection. You're --</p> <p>9 you're misstating her answer from before and that's</p> <p>10 misleading. That's not what she testified to.</p> <p>11 MR. BALLASES: Okay. Make your</p> <p>12 objection on the record. No speaking objections.</p> <p>13 MR. CHOUDHRI: And pursuant to Rule</p> <p>14 30, you're violating by not providing the exhibits</p> <p>15 you're asking questions of the deponent.</p> <p>16 I'm a party sitting here, and you're</p> <p>17 refusing to provide exhibits to the other parties in</p> <p>18 the deposition.</p> <p>19 MR. BALLASES: Okay.</p> <p>20 MR. CHOUDHRI: And you just say you</p> <p>21 have no -- you have no excuse or reason. You just</p> <p>22 don't want to do it.</p> <p>23 MR. BALLASES: The deposition -- the</p> <p>24 exhibits have all been given to everybody.</p> <p>25 MR. CHOUDHRI: I have not --</p>	<p style="text-align: right;">Page 37</p> <p>1 me exhibits in this deposition.</p> <p>2 MR. BALLASES: Okay.</p> <p>3 MR. CHOUDHRI: And you cannot give me</p> <p>4 any good reason why.</p> <p>5 MR. BALLASES: Okay.</p> <p>6 Q. (BY MR. BALLASES:) So if you look a little</p> <p>7 bit further on BRIDGECO 84, which is still Exhibit 16</p> <p>8 --</p> <p>9 MR. CHOUDHRI: Not sharing exhibits, I</p> <p>10 object to you not sharing exhibits.</p> <p>11 MR. BALLASES: You said that five</p> <p>12 times. Thank you.</p> <p>13 MR. CHOUDHRI: And you're refusing to</p> <p>14 do so.</p> <p>15 MR. BALLASES: Thank you for stating</p> <p>16 your objection on the record.</p> <p>17 MR. CHOUDHRI: Is there a reason</p> <p>18 you're refusing to do so?</p> <p>19 MR. BALLASES: Do you want to --</p> <p>20 THE WITNESS: Okay. One thing is very</p> <p>21 important. People respect each other. If he's telling</p> <p>22 now, you have to answer it. You both should be, but</p> <p>23 this is not a way to do the things, not like that. I'm</p> <p>24 not this kind of person that I have to see these</p> <p>25 things.</p>

<p style="text-align: right;">Page 38</p> <p>1 MR. BALLASES: Okay.</p> <p>2 MR. CHOUDHRI: Hiding the exhibits</p> <p>3 from the parties --</p> <p>4 (Ms. Choudhri speaking foreign</p> <p>5 language.)</p> <p>6 MR. CHOUDHRI: I'm putting my</p> <p>7 objection on the record.</p> <p>8 Mr. Ballases, is there some reason you</p> <p>9 don't want to hand me the exhibits and I'm a party</p> <p>10 here? You're asking questions. If the exhibits are</p> <p>11 not shared and the objection --- and -- and -- and --</p> <p>12 and it's a lack of foundation of the questions based on</p> <p>13 the exhibit, there is not foundation for the questions</p> <p>14 being asked. You're refusing to hand me the exhibits</p> <p>15 you're asking questions on.</p> <p>16 MR. BALLASES: Thank you for stating</p> <p>17 your objection on the record. So continuing on --</p> <p>18 MR. CHOUDHRI: And you're still going</p> <p>19 to continue to not share the exhibits with me, correct?</p> <p>20 Q. (BY MR. BALLASES:) Do you --</p> <p>21 MR. BALLASES: Mr. Choudhri, with all</p> <p>22 due respect, I've gone in front of this Judge I think</p> <p>23 like four times having to do with this deposition. If</p> <p>24 I go in front of him again, it's going to be more bad</p> <p>25 news for you. Please, just let me conduct the</p>	<p style="text-align: right;">Page 40</p> <p>1 payment, correct?</p> <p>2 MS. HOOD: Objection, it's not what</p> <p>3 she said --</p> <p>4 A. I don't know.</p> <p>5 MR. CHOUDHRI: Mr. Ballases, please, I</p> <p>6 object to you misstating her answers. If her answers</p> <p>7 are "I don't remember," don't misstate what they are.</p> <p>8 And I'm going to have a running</p> <p>9 objection for lack of foundation for any questions</p> <p>10 because exhibits have not been provided to me.</p> <p>11 Or would you like me to object every</p> <p>12 time or can you agree that I have a running objection,</p> <p>13 Mr. Ballases?</p> <p>14 MR. BALLASES: I'd like you to object</p> <p>15 every time.</p> <p>16 MR. CHOUDHRI: Okay.</p> <p>17 Q. (BY MR. BALLASES:) Okay. If you could turn</p> <p>18 to the next page, BRIDGECO 88, just one page over?</p> <p>19 A. This one?</p> <p>20 Q. Yes, BRIDGECO 88.</p> <p>21 MR. CHOUDHRI: Objection, lack of</p> <p>22 foundation.</p> <p>23 Q. (BY MR. BALLASES:) So if you look at BRIDGECO</p> <p>24 88 --</p> <p>25 MR. CHOUDHRI: You're not sharing</p>
<p style="text-align: right;">Page 39</p> <p>1 deposition --</p> <p>2 MS. HOOD: Uh -- uh -- uh -- can we --</p> <p>3 can we just stop threatening each other and let her</p> <p>4 finish her deposition, please.</p> <p>5 MR. BALLASES: I'm trying, I'm trying.</p> <p>6 THE WITNESS: Yes, she can talk now.</p> <p>7 Just both she can talk and they can talk. Okay. I am</p> <p>8 listening.</p> <p>9 Q. (BY MR. BALLASES:) Okay. So it's Exhibit 16</p> <p>10 still, Bates label Page BRIDGECO 84. There is another</p> <p>11 entry that shows a debit or a payment of \$213,500 --</p> <p>12 A. Where?</p> <p>13 Q. Sure. I'll help you. So Exhibit 16 and</p> <p>14 BRIDGECO 84. There you go.</p> <p>15 A. Okay.</p> <p>16 Q. Okay. So if you look at the bottom of that</p> <p>17 page, there's a debit in the amount of "\$213,500" for</p> <p>18 "PBAC 507 Holdings, LLC"; do you see that?</p> <p>19 A. Yes.</p> <p>20 Q. Okay. Can you tell the Judge what that</p> <p>21 payment to PBAC 507 Holdings, LLC, pertain to?</p> <p>22 A. I don't know of any -- I can't explain</p> <p>23 anything because it's -- I don't know what for that. I</p> <p>24 don't know.</p> <p>25 Q. You certainly didn't authorize or make that</p>	<p style="text-align: right;">Page 41</p> <p>1 exhibits, Mr. Ballases.</p> <p>2 Q. (BY MR. BALLASES:) -- there, on there, there</p> <p>3 is a deposit or credit in the amount of "\$365,525.66"</p> <p>4 from "Hudson Title Group, LLC." And if you look a</p> <p>5 little bit further down in the entry, it says "Seller</p> <p>6 Proceeds Ali" and it says "CHOUDH," I'm assuming that</p> <p>7 means Choudhri, but it doesn't say the full name; do</p> <p>8 you see that?</p> <p>9 A. Yes.</p> <p>10 MR. CHOUDHRI: Objection.</p> <p>11 Q. (BY MR. BALLASES:) Okay. And so can you see</p> <p>12 -- or can you tell the Judge why this deposit of</p> <p>13 365,000 some-odd dollars was made into this account on</p> <p>14 or about June 24th?</p> <p>15 MR. CHOUDHRI: Objection, opposing</p> <p>16 counsel's failed to lay the proper --</p> <p>17 A. I don't know --</p> <p>18 MR. CHOUDHRI: Wait -- wait -- let</p> <p>19 me -- let me get my objection in before you answer the</p> <p>20 question, please.</p> <p>21 THE WITNESS: Okay.</p> <p>22 MR. CHOUDHRI: Objection. You failed</p> <p>23 to lay the proper foundation for this question. You</p> <p>24 failed to provide the exhibits. Objection, form.</p> <p>25 Q. (BY MR. BALLASES:) Okay. Would you like me</p>

<p style="text-align: right;">Page 42</p> <p>1 to restate the question, or do you want to -- do you</p> <p>2 remember it?</p> <p>3 A. Okay. Yes.</p> <p>4 Q. Okay. So my --</p> <p>5 A. I don't know -- I don't know where the money</p> <p>6 going and coming. I don't remember because I don't</p> <p>7 know. Some accounts are closed. Most accounts are</p> <p>8 closed.</p> <p>9 Q. Okay.</p> <p>10 MR. CHOUDHRI: Objection.</p> <p>11 A. There's so many accounts. You're asking</p> <p>12 about any account, they're already closed.</p> <p>13 Q. (BY MR. BALLASES:) Okay. So you're saying</p> <p>14 this account with Bancorp South which is now Cadence is</p> <p>15 closed?</p> <p>16 A. Yes.</p> <p>17 Q. Okay. So did you -- so do you know on this</p> <p>18 same page, there are entries and there throughout this</p> <p>19 document of "Oasis Batch" and then it says "payroll";</p> <p>20 do you see that?</p> <p>21 A. Where is?</p> <p>22 Q. Right there. It says "Oasis Batch."</p> <p>23 MR. CHOUDHRI: Objection.</p> <p>24 A. Okay. Maybe I help --</p> <p>25 MR. CHOUDHRI: Objection.</p>	<p style="text-align: right;">Page 44</p> <p>1 your answer for the whole depo?</p> <p>2 MR. BALLASES: I'm going to conduct</p> <p>3 the deposition. And the longer -- the more times you</p> <p>4 interject, the longer this is going to take.</p> <p>5 MR. CHOUDHRI: I'm objecting --</p> <p>6 MS. HOOD: Okay. So I just want to</p> <p>7 let you know that I'm having a 35-minute break</p> <p>8 schedule.</p> <p>9 MR. BALLASES: Do you want to take a</p> <p>10 break?</p> <p>11 MS. HOOD: Yeah.</p> <p>12 MR. BALLASES: Ok, that's fine.</p> <p>13 That's fine.</p> <p>14 Let's go off the record.</p> <p>15 THE VIDEOGRAPHER: Off the record at</p> <p>16 12:07.</p> <p>17 (Off the record.)</p> <p>18 THE VIDEOGRAPHER: We are back on the</p> <p>19 record at 12:20.</p> <p>20 Q. (BY MR. BALLASES:) Ms. Choudhri, we just took</p> <p>21 a short break. Are you ready to get going?</p> <p>22 A. Yeah.</p> <p>23 Q. Okay. Thanks.</p> <p>24 If you turn to Exhibit 17 in the exhibits in</p> <p>25 front of you. Yup, there you go.</p>
<p style="text-align: right;">Page 43</p> <p>1 A. -- I help someone, but this account is closed</p> <p>2 for long time.</p> <p>3 Q. (BY MR. BALLASES:) Okay. I just --</p> <p>4 A. I don't check the -- no, I don't check this</p> <p>5 anymore.</p> <p>6 Q. Okay. But my question's a little bit</p> <p>7 different and I appreciate that.</p> <p>8 But so there's lots of entries that say</p> <p>9 "Oasis Batch Payroll" --</p> <p>10 A. I don't remember.</p> <p>11 MR. CHOUDHRI: Objection, lack of</p> <p>12 proper foundation.</p> <p>13 Q. (BY MR. BALLASES:) Okay. So as you sit here</p> <p>14 today, Ms. Choudhri, do you have any recollection of</p> <p>15 making a payment to or receiving a payment from Oasis</p> <p>16 Batch?</p> <p>17 A. I don't know.</p> <p>18 MR. CHOUDHRI: Objection.</p> <p>19 Q. (BY MR. BALLASES:) Can you tell the Judge</p> <p>20 what Oasis Batch pertains to?</p> <p>21 A. Okay. I don't remember.</p> <p>22 Q. Okay.</p> <p>23 MR. CHOUDHRI: Mr. Ballases, are you</p> <p>24 going to refuse to provide me any of these exhibits</p> <p>25 that you're asking questions on? Is that going to be</p>	<p style="text-align: right;">Page 45</p> <p>1 Okay. Exhibit 17 is an account statement for</p> <p>2 an Icon Bank bank account for it says, yourself and Ali</p> <p>3 Choudhri. Do you see that?</p> <p>4 A. Yes.</p> <p>5 MR. CHOUDHRI: Objection, form.</p> <p>6 Q. (BY MR. BALLASES:) Okay. And this is for</p> <p>7 account number 76620?</p> <p>8 MR. CHOUDHRI: Objection, form.</p> <p>9 A. I don't know.</p> <p>10 Q. (BY MR. BALLASES:) It says it right there.</p> <p>11 A. Yes, I don't remember.</p> <p>12 MR. CHOUDHRI: Objection, form.</p> <p>13 Q. (BY MR. BALLASES:) That's okay.</p> <p>14 And this account it shows was opened it looks</p> <p>15 like May 3rd of 2011?</p> <p>16 MR. CHOUDHRI: Objection, form.</p> <p>17 A. I don't know. I don't remember.</p> <p>18 Q. Okay.</p> <p>19 MR. CHOUDHRI: Just wait until I get</p> <p>20 my objection in, please, before you answer.</p> <p>21 Q. (BY MR. BALLASES:) Okay. So it -- and it</p> <p>22 shows that the email associated with this account is</p> <p>23 "dward@jetallcompanies.com"; do you see that?</p> <p>24 A. Yes.</p> <p>25 MR. CHOUDHRI: Objection, form.</p>

<p style="text-align: right;">Page 46</p> <p>1 A. I don't remember this one.</p> <p>2 MR. CHOUDHRI: Well, before you</p> <p>3 answer, let me get my objection on the record.</p> <p>4 Q. (BY MR. BALLASES:) Do you have a recollection</p> <p>5 of opening this bank account with your son, Ali</p> <p>6 Choudhri?</p> <p>7 A. I don't --</p> <p>8 MR. CHOUDHRI: Objection, form.</p> <p>9 MS. HOOD: Okay. He asked a question.</p> <p>10 He's objecting. When he finishes, then you answer.</p> <p>11 Okay. That way, the court reporter can get everybody's</p> <p>12 comments.</p> <p>13 Q. (BY MR. BALLASES:) Okay. So let me re-ask</p> <p>14 the question.</p> <p>15 Do you have a recollection of opening this</p> <p>16 bank account that is shown in Exhibit 17 with yourself</p> <p>17 and your son Ali Choudhri?</p> <p>18 MR. CHOUDHRI: Objection, form.</p> <p>19 A. I don't know.</p> <p>20 Q. (BY MR. BALLASES:) Okay.</p> <p>21 MS. HOOD: Just for clarity of the</p> <p>22 record, is it "I don't know" or "I don't remember"?</p> <p>23 MR. BALLASES: She said "I don't</p> <p>24 know."</p> <p>25 MR. CHOUDHRI: Is your answer for the</p>	<p style="text-align: right;">Page 48</p> <p>1 MR. CHOUDHRI: Objection, form.</p> <p>2 A. Uh-huh.</p> <p>3 Q. (BY MR. BALLASES:) Okay. And, again, the</p> <p>4 email associated with this account is, again,</p> <p>5 "dward@jetallcompanies.com"; do you see that?</p> <p>6 A. I don't remember.</p> <p>7 MR. CHOUDHRI: Objection, form.</p> <p>8 Q. (BY MR. BALLASES:) Okay.</p> <p>9 MR. CHOUDHRI: Wait -- wait until</p> <p>10 I give my objection. So he'll ask the question. I'll</p> <p>11 object, then you can answer. For the court reporter so</p> <p>12 she doesn't get mixed up. So we're not talking over</p> <p>13 each other.</p> <p>14 Q. (BY MR. BALLASES:) So I'm assuming your</p> <p>15 answer will be the same as it was on the previous</p> <p>16 account, but I want to ask.</p> <p>17 So do you have a recollection of opening this</p> <p>18 bank account with your son Ali Choudhri at Icon Bank</p> <p>19 that's reflected in Exhibit 18?</p> <p>20 MR. CHOUDHRI: Objection, form.</p> <p>21 A. Yes. I don't remember.</p> <p>22 Q. (BY MR. BALLASES:) Okay. Could you please</p> <p>23 turn to Exhibit 19 from your previous deposition.</p> <p>24 That's it.</p> <p>25 So Exhibit 19 to your deposition is an</p>
<p style="text-align: right;">Page 47</p> <p>1 record --</p> <p>2 MS. HOOD: I'm asking her.</p> <p>3 Is it "I don't know" or "I don't</p> <p>4 remember," your answer that you just gave?</p> <p>5 THE WITNESS: Okay.</p> <p>6 Q. (BY MR. BALLASES:) What she wants you -- what</p> <p>7 Ms. Hood is asking you to answer is, do you --</p> <p>8 MS. HOOD: I'm asking for</p> <p>9 clarification.</p> <p>10 Is it you don't know or is it that you</p> <p>11 don't remember?</p> <p>12 Q. (BY MR. BALLASES:) Okay. Do you remember</p> <p>13 opening an account with your son at this bank or do you</p> <p>14 not know?</p> <p>15 A. I don't remember.</p> <p>16 Q. Okay. If you turn to Exhibit 18 in front of</p> <p>17 you. There you go. Okay. Exhibit 18, yeah, this is</p> <p>18 18, see, it says it right there.</p> <p>19 Exhibit 18 is another bank account opened at</p> <p>20 Icon Bank between it says yourself and Ali Choudhri.</p> <p>21 Do you see that?</p> <p>22 A. Yes.</p> <p>23 MR. CHOUDHRI: Objection, form.</p> <p>24 Q. (BY MR. BALLASES:) This one is for Account</p> <p>25 No. 7662010. Do you see that?</p>	<p style="text-align: right;">Page 49</p> <p>1 account agreement with Cadence Bank and the account</p> <p>2 holder is "Otisco RDX, LLC"; do you see that at the</p> <p>3 top?</p> <p>4 A. Yes.</p> <p>5 MR. CHOUDHRI: Objection, form.</p> <p>6 Q. (BY MR. BALLASES:) Okay. And it's for</p> <p>7 Account No. 81966681. Do you see that?</p> <p>8 MR. CHOUDHRI: Objection, form.</p> <p>9 A. Yes.</p> <p>10 Q. (BY MR. BALLASES:) Okay. And it says at the</p> <p>11 bottom of the page it's signed by the -- it says the</p> <p>12 owner of Otisco RDX, LLC, which is -- looks like "S.</p> <p>13 Choudhri"; is that right?</p> <p>14 MR. CHOUDHRI: Objection, form.</p> <p>15 A. Yes. I don't remember about this.</p> <p>16 Q. (BY MR. BALLASES:) Okay. So I think I know</p> <p>17 what your testimony is, which is that you don't</p> <p>18 remember opening this account the way it's shown?</p> <p>19 MR. CHOUDHRI: Objection, form.</p> <p>20 A. I don't know about anything about this</p> <p>21 account.</p> <p>22 MR. CHOUDHRI: Objection, form.</p> <p>23 Q. (BY MR. BALLASES:) Is that your signature</p> <p>24 on -- on Exhibit 19?</p> <p>25 MR. CHOUDHRI: Objection, form.</p>

<p style="text-align: right;">Page 50</p> <p>1 A. I don't know.</p> <p>2 Q. (BY MR. BALLASES:) Okay. So does that look</p> <p>3 like your signature?</p> <p>4 MR. CHOUDHRI: Objection, form.</p> <p>5 A. Maybe. I don't remember.</p> <p>6 Q. (BY MR. BALLASES:) No. I understand you</p> <p>7 don't remember signing it and that's -- that's clear on</p> <p>8 the record. But my question is, does the signature</p> <p>9 that purports to be Shahnaz Choudhri's signature on</p> <p>10 Exhibit 19, does that look like your signature?</p> <p>11 MR. CHOUDHRI: Objection, form.</p> <p>12 MS. HOOD: I think she's answered your</p> <p>13 question.</p> <p>14 A. I don't know. I don't know. I don't know</p> <p>15 about that.</p> <p>16 Q. (BY MR. BALLASES:) Okay. Could you please</p> <p>17 turn to Exhibit 22. Yeah, right there. There you go.</p> <p>18 So Exhibit 22 to your first deposition is a</p> <p>19 document titled "Account Agreement" for "BancorpSouth</p> <p>20 Bank (a division of Cadence Bank)"; do you see that?</p> <p>21 MR. CHOUDHRI: Objection, form.</p> <p>22 A. Yes.</p> <p>23 Q. (BY MR. BALLASES:) Okay. And it says the</p> <p>24 account holder is Shahnaz Choudhri; is that right?</p> <p>25 MR. CHOUDHRI: Objection, form.</p>	<p style="text-align: right;">Page 52</p> <p>1 A. I don't remember.</p> <p>2 Q. (BY MR. BALLASES:) Okay. Do you recall</p> <p>3 having a bank account with Cadence Bank at all?</p> <p>4 A. Yes.</p> <p>5 MR. CHOUDHRI: Objection, form.</p> <p>6 A. Since I have -- not feeling good, my memory</p> <p>7 has gone bad and that's why I don't remember most of</p> <p>8 things. And then this is old things that I don't take</p> <p>9 it, no, easily.</p> <p>10 Q. (BY MR. BALLASES:) Okay.</p> <p>11 A. You can understand my situation now.</p> <p>12 Q. I understand. I appreciate you telling me.</p> <p>13 Could you turn to -- let me tab it. So I'm</p> <p>14 going to tab Exhibit 22 for you so you can get back to</p> <p>15 it easy. But can you turn to Exhibit 23, please.</p> <p>16 Okay. So Exhibit 23 is another account</p> <p>17 agreement with Cadence Bank for the account holder</p> <p>18 Shahnaz Choudhri. Do you see that at the top?</p> <p>19 MR. CHOUDHRI: Objection, form.</p> <p>20 A. Yes.</p> <p>21 Q. (BY MR. BALLASES:) Okay. And this is for the</p> <p>22 same account that we just looked at in Exhibit 22,</p> <p>23 which is 79714333. Do you see that?</p> <p>24 MR. CHOUDHRI: Objection, form.</p> <p>25 A. Yes.</p>
<p style="text-align: right;">Page 51</p> <p>1 A. I don't know.</p> <p>2 Q. (BY MR. BALLASES:) It says it right there?</p> <p>3 A. Yes.</p> <p>4 Q. Okay.</p> <p>5 MR. CHOUDHRI: Objection, form.</p> <p>6 Q. (BY MR. BALLASES:) And this is for Account</p> <p>7 No. 79714333. Do you see that?</p> <p>8 MR. CHOUDHRI: Objection, form.</p> <p>9 A. Yes.</p> <p>10 Q. (BY MR. BALLASES:) Okay. And it says that</p> <p>11 this account was opened August 29th of 2022.</p> <p>12 MR. CHOUDHRI: Objection, form.</p> <p>13 A. I don't know.</p> <p>14 Q. (BY MR. BALLASES:) It says it right up there.</p> <p>15 MR. CHOUDHRI: Objection, form.</p> <p>16 A. Yeah, I don't remember.</p> <p>17 Q. (BY MR. BALLASES:) Yeah. I understand if you</p> <p>18 don't remember. I'm just asking you to verify certain</p> <p>19 things right now.</p> <p>20 A. Okay.</p> <p>21 Q. So as you sit here today, with respect to</p> <p>22 Exhibit 22 and the account that's described there in</p> <p>23 that account agreement, do you recall opening this</p> <p>24 account with the bank?</p> <p>25 MR. CHOUDHRI: Objection, form.</p>	<p style="text-align: right;">Page 53</p> <p>1 Q. (BY MR. BALLASES:) Okay. This one, though,</p> <p>2 this account agreement is dated October 13th, 2022,</p> <p>3 though, which is a few months after the -- the August</p> <p>4 date that we saw on Exhibit 22; is that right?</p> <p>5 MR. CHOUDHRI: Objection, form.</p> <p>6 A. Yes.</p> <p>7 Q. (BY MR. BALLASES:) Okay. This one here, if</p> <p>8 you look at the bottom, it's got a -- it says</p> <p>9 "Convenience Signer Designation"; do you see that?</p> <p>10 A. Uh-huh.</p> <p>11 Q. Okay. And it says "You have designated" --</p> <p>12 I'm going to read it. That "You have designated ALI</p> <p>13 CHOUDHRI to act on your behalf as Convenience Signer,</p> <p>14 assessing the account solely for the convenience of the</p> <p>15 parties." Do you see that?</p> <p>16 MR. CHOUDHRI: Objection, form.</p> <p>17 A. Yes, I can see.</p> <p>18 Q. (BY MR. BALLASES:) Okay. Do you have a</p> <p>19 recollection of going to the bank -- going to Cadence</p> <p>20 Bank and telling Cadence Bank that Ali Choudhri can now</p> <p>21 sign for checks on your behalf for this account that's</p> <p>22 in your name?</p> <p>23 MR. CHOUDHRI: Objection, form.</p> <p>24 Q. (BY MR. BALLASES:) Do you remember that or</p> <p>25 not?</p>



<p style="text-align: right;">Page 54</p> <p>1 A. No. I don't know what you're talking about.</p> <p>2 I don't remember.</p> <p>3 Q. Okay. Do you remember going to a bank just</p> <p>4 generally and saying, you know what, Bank, I want it so</p> <p>5 my son Ali Choudhri can sign my name on checks?</p> <p>6 MR. CHOUDHRI: Objection, form.</p> <p>7 A. No.</p> <p>8 Q. (BY MR. BALLASES:) Did you ever do that?</p> <p>9 MR. CHOUDHRI: Objection, form.</p> <p>10 A. No.</p> <p>11 Q. (BY MR. BALLASES:) Okay. Okay. Would you</p> <p>12 mind turning to Exhibit 24. There you go.</p> <p>13 Okay. Exhibit 24 is a Cadence Bank statement</p> <p>14 for Otisco RDX, LLC. Do you see that?</p> <p>15 MR. CHOUDHRI: Objection, form.</p> <p>16 A. Yes.</p> <p>17 Q. (BY MR. BALLASES:) Okay. And it looks like</p> <p>18 the statement date for the first page of this exhibit</p> <p>19 is May 31st, 2023. Do you see that?</p> <p>20 A. Yes.</p> <p>21 MR. CHOUDHRI: Objection, form.</p> <p>22 Q. (BY MR. BALLASES:) And the Account Number is</p> <p>23 81966681. Do you see that?</p> <p>24 A. Yes.</p> <p>25 MR. CHOUDHRI: Objection, form.</p>	<p style="text-align: right;">Page 56</p> <p>1 Q. (BY MR. BALLASES:) Sure. So we're still on</p> <p>2 Exhibit 24.</p> <p>3 A. 25th or 24?</p> <p>4 Q. 24. And see that entry right there. It's --</p> <p>5 and I'll just repeat it since you've got -- so you've</p> <p>6 got it in front of you. It's \$454,261.50 from Fidelity</p> <p>7 National Title Agency, Inc. Do you see that?</p> <p>8 MR. CHOUDHRI: Objection, form.</p> <p>9 A. Since I don't know about anything.</p> <p>10 Q. (BY MR. BALLASES:) Okay. So I think what</p> <p>11 you're telling me is, you cannot tell the Judge why</p> <p>12 that money was deposited into Otisco RDX, LLC's account</p> <p>13 as reflected on Page 1 of Exhibit 24?</p> <p>14 MR. CHOUDHRI: Objection, form.</p> <p>15 A. Yes. I don't know about.</p> <p>16 Q. (BY MR. BALLASES:) Okay. If you turn to the</p> <p>17 bank statement in Exhibit 24 that is June 30th, 2023.</p> <p>18 And I can help you. That may be it. Yes, that's it.</p> <p>19 On this particular bank statement, the June</p> <p>20 30th, 2023 bank statement in Exhibit 24, it shows a</p> <p>21 debit or a payment of \$150,000 to Akin Gump Strauss</p> <p>22 Hauer &amp; Field -- Feld, LLP. Do you see that?</p> <p>23 A. Yes.</p> <p>24 MR. CHOUDHRI: Objection, form.</p> <p>25 Q. (BY MR. BALLASES:) Okay. Did you ever</p>
<p style="text-align: right;">Page 55</p> <p>1 Q. (BY MR. BALLASES:) Okay. On this particular</p> <p>2 page, the first page of Exhibit 24, it says that there</p> <p>3 is a deposit or credit of \$100,000 from Checking</p> <p>4 Account 79714333. Do you see that?</p> <p>5 MR. CHOUDHRI: Objection, form.</p> <p>6 Objection, form.</p> <p>7 A. Yeah. I don't know which one this is.</p> <p>8 Q. (BY MR. BALLASES:) Sure.</p> <p>9 A. Yes, I can see.</p> <p>10 Q. Okay. So do you -- can you tell Judge Norman</p> <p>11 why this money was transferred from this particular</p> <p>12 account, the 79714333 account, which is your account,</p> <p>13 into this Otisco bank account that's shown on Exhibit</p> <p>14 24?</p> <p>15 MR. CHOUDHRI: Objection, form.</p> <p>16 A. Yes. I don't know.</p> <p>17 Q. (BY MR. BALLASES:) Okay. You don't remember?</p> <p>18 A. Yes. I don't know what I --</p> <p>19 Q. Okay. That's okay.</p> <p>20 And so if you look in the next entry, which</p> <p>21 is also May 18th of 2023 on the first page of Exhibit</p> <p>22 24, it shows a deposit of 454,261.51 from Fidelity</p> <p>23 National Title Agency, Inc. Do you see that entry?</p> <p>24 MR. CHOUDHRI: Objection, form.</p> <p>25 A. Which one?</p>	<p style="text-align: right;">Page 57</p> <p>1 authorize Otisco to make \$150,000 payment to the law</p> <p>2 firm of Akin Gump Strauss Hauer &amp; Feld?</p> <p>3 MR. CHOUDHRI: Objection, form.</p> <p>4 A. I don't know about it.</p> <p>5 Q. (BY MR. BALLASES:) Okay. So as you sit here</p> <p>6 today, you can't remember authorizing that payment?</p> <p>7 A. I don't know.</p> <p>8 Q. Okay.</p> <p>9 MR. CHOUDHRI: Is your answer, just to</p> <p>10 clarify, he's asking if you remember. Is your answer</p> <p>11 you don't remember or you don't know because he just</p> <p>12 asked you if you remember.</p> <p>13 A. Yes. I don't remember.</p> <p>14 MR. CHOUDHRI: I want to make sure the</p> <p>15 record is clear.</p> <p>16 Q. (BY MR. BALLASES:) Okay. So if you turn to</p> <p>17 --</p> <p>18 MR. CHOUDHRI: So your answer was you</p> <p>19 don't remember?</p> <p>20 MS. HOOD: I think that's what she</p> <p>21 said.</p> <p>22 MR. CHOUDHRI: Okay. I just want to</p> <p>23 make sure the court report has it clear.</p> <p>24 Q. (BY MR. BALLASES:) If you turn to -- stay on</p> <p>25 the same exhibit, Exhibit 24, but if you turn to the</p>

<p style="text-align: right;">Page 58</p> <p>1 bank statement that is August 31st, 2023. I can help</p> <p>2 you. There you go.</p> <p>3 Okay. So the August 31st, 2023 bank</p> <p>4 statement for Otisco shows a debit, which means a</p> <p>5 payment, of \$50,000 to Jetwall Companies. I think it</p> <p>6 means Jetall, but it says J-E-T-W-A-L-L Companies. Do</p> <p>7 you see that entry?</p> <p>8 MR. CHOUDHRI: Objection, form.</p> <p>9 MS. HOOD: Let me see. What did you</p> <p>10 say?</p> <p>11 THE WITNESS: The Jetall --</p> <p>12 MR. BALLASES: Jetwall. I think it</p> <p>13 means Jetall, but it says Jetwall.</p> <p>14 MS. HOOD: Okay. But now you're</p> <p>15 testifying about what a document says. So I'm going to</p> <p>16 object --</p> <p>17 MR. BALLASES: I'm just asking her if</p> <p>18 she sees it.</p> <p>19 MS. HOOD: I'm going to object to</p> <p>20 form.</p> <p>21 MR. CHOUDHRI: Objection. Objection,</p> <p>22 form.</p> <p>23 Q. (BY MR. BALLASES:) Okay. Do you see the</p> <p>24 entry?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 60</p> <p>1 question is -- and I'll restate it for you because</p> <p>2 everyone wanted to talk.</p> <p>3 The \$50,000 debit to Jetall Companies that</p> <p>4 came from this particular bank account, the Otisco RDX</p> <p>5 Cadence Bank account on August 14th of 2023, did you</p> <p>6 authorize that payment to be made?</p> <p>7 MR. CHOUDHRI: Objection, form.</p> <p>8 A. I don't remember.</p> <p>9 Q. (BY MR. BALLASES:) Okay. If you turn to --</p> <p>10 stay on that same exhibit, Exhibit 24, but turn to the</p> <p>11 September 30th bank statement. There you go.</p> <p>12 So the Exhibit 24 Cadence Bank, Otisco RDX,</p> <p>13 LLC, account statement date September 30th, 2023 shows</p> <p>14 a couple of debits that I want to talk about.</p> <p>15 The first one is on September 21st of 2023</p> <p>16 and it's \$50,000 to Akin Gump Strauss Hauer &amp; Feld. Do</p> <p>17 you see that?</p> <p>18 MR. CHOUDHRI: Objection, form.</p> <p>19 A. Yes.</p> <p>20 Q. (BY MR. BALLASES:) Okay. Can you tell the</p> <p>21 Court what that payment was for?</p> <p>22 MR. CHOUDHRI: Objection, form.</p> <p>23 A. I don't know. I don't remember.</p> <p>24 Q. (BY MR. BALLASES:) Okay. Did you authorize</p> <p>25 that payment to be made from this account?</p>
<p style="text-align: right;">Page 59</p> <p>1 Q. Can you tell Judge Norman why this bank</p> <p>2 account, the Otisco RDX, LLC, bank account paid Jetall</p> <p>3 \$50,000 on August 14th of 2023?</p> <p>4 MR. CHOUDHRI: Object to form.</p> <p>5 MS. HOOD: Object to form. That's not</p> <p>6 what the document says.</p> <p>7 A. No. I don't know.</p> <p>8 Q. (BY MR. BALLASES:) Okay. Did you authorize</p> <p>9 this payment or this -- or this payment that's</p> <p>10 transferred of \$50,000 to Jetall Companies?</p> <p>11 MS. HOOD: Objection. Object to form.</p> <p>12 MR. CHOUDHRI: Objection, form.</p> <p>13 MS. HOOD: That's not what the</p> <p>14 document says.</p> <p>15 MR. BALLASES: Okay. Make your</p> <p>16 objection to form and move on.</p> <p>17 MR. CHOUDHRI: Misstates what the</p> <p>18 document says. And I don't even have the document, so</p> <p>19 I object to asking questions without providing the</p> <p>20 document.</p> <p>21 MS. HOOD: You can answer --</p> <p>22 MR. BALLASES: Thank you.</p> <p>23 MS. HOOD: -- if you know. If you</p> <p>24 know, you can answer.</p> <p>25 Q. (BY MR. BALLASES:) Right. So my -- my</p>	<p style="text-align: right;">Page 61</p> <p>1 MR. CHOUDHRI: Objection, form.</p> <p>2 A. No.</p> <p>3 Q. (BY MR. BALLASES:) Okay. If you go just a</p> <p>4 little bit two -- two entries down on September 29th,</p> <p>5 2023, it shows a debit in the amount of \$187,235.60 to</p> <p>6 Caz Creek Holdings. Do you see that?</p> <p>7 A. Yes.</p> <p>8 MR. CHOUDHRI: Objection, form.</p> <p>9 Q. (BY MR. BALLASES:) Okay. Can you tell the</p> <p>10 Judge what that payment has to do with?</p> <p>11 MR. CHOUDHRI: Objection, form.</p> <p>12 A. I don't know.</p> <p>13 Q. (BY MR. BALLASES:) Did you authorize that</p> <p>14 payment to be made from this account to Caz Creek</p> <p>15 Holdings?</p> <p>16 MR. CHOUDHRI: Objection, form.</p> <p>17 A. I don't remember.</p> <p>18 Q. (BY MR. BALLASES:) Okay. Okay. If you could</p> <p>19 turn to Exhibit 25 from your first deposition. This is</p> <p>20 now -- it's a -- it's a -- it's another Cadence Bank</p> <p>21 bank statement, but it's from the Account No. 79714333.</p> <p>22 Do you see that?</p> <p>23 A. Yes.</p> <p>24 MR. CHOUDHRI: Objection, form.</p> <p>25 Q. (BY MR. BALLASES:) And so this account is in</p>

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<p style="text-align: right;">Page 62</p> <p>1 your name. It's not in Otisco anymore. It's in 2 Shahnaz Choudhri's name. Do you see that? 3 A. Yes. 4 MR. CHOUDHRI: Objection, form. 5 Q. (BY MR. BALLASES:) Okay. When look at the 6 first page of Exhibit 25, it's a statement dated 7 September 12th, 2022, it shows a deposit of one million 8 dollars made on August 29th of 2022. Do you see that 9 entry? 10 A. Yes. 11 MR. CHOUDHRI: Objection, form. 12 Q. (BY MR. BALLASES:) Okay. Can you tell the 13 Court from where that million dollars originated? 14 MR. CHOUDHRI: Objection, form. 15 A. I don't know. 16 Q. (BY MR. BALLASES:) Okay. Do you have a 17 recollection of making this one-million-dollar deposit 18 into this account? 19 A. I don't remember. 20 MR. CHOUDHRI: Objection, form. 21 Q. (BY MR. BALLASES:) Okay. 22 MR. CHOUDHRI: And for the record, 23 Beth Mendez is still in this room in this deposition 24 over our objection. Yet, she has no right to be here. 25 And she's here making gestures to the other parties,</p>	<p style="text-align: right;">Page 64</p> <p>1 objections? 2 THE REPORTER: I'm getting them, but you 3 can -- 4 MR. CHOUDHRI: You are? Okay. I want to 5 make sure you are. All right. Thanks. 6 Q. (BY MR. BALLASES:) Okay. So a little bit 7 further down, the next entry on that same day, 8 September 20th, it shows a \$2 million deposit into your 9 account. Do you see that? 10 A. Yes. 11 MR. CHOUDHRI: Objection, form. 12 Q. (BY MR. BALLASES:) Okay. Can you tell Court 13 from where this \$2 million originated from? 14 MR. CHOUDHRI: Objection, form. 15 A. I don't remember. 16 Q. (BY MR. BALLASES:) Do you have a recollection 17 of making this two-million-dollar deposit into this 18 particular account that is reflected in Exhibit 25? 19 MR. CHOUDHRI: Objection, form. 20 A. I don't know. 21 Q. (BY MR. BALLASES:) Okay. If we look a little 22 bit further down, the next entry is from October 3rd, 23 2022 and it shows a deposit or credit of \$1,901,054.13 24 from Fidelity National Title, Inc. Do you see that? 25 MR. CHOUDHRI: Objection, form.</p>
<p style="text-align: right;">Page 63</p> <p>1 and she should not be in this deposition and she's not 2 a party. 3 MR. BALLASES: Okay. Thank you for 4 your speaking objection and, no, she's not making 5 gestures to anybody. 6 Q. (BY MR. BALLASES:) Ms. Choudhri, -- 7 MR. CHOUDHRI: What -- what grounds 8 does she have a right to be here, Mr. Ballases? 9 Q. (BY MR. BALLASES:) -- if you turn to the 10 statement dated October 13th -- I think this is it -- 11 2022, yes -- of this -- of the same exhibit, Exhibit 12 25, there are a few entries I want to discuss. 13 The first one is a deposit in the amount of 14 \$50,000 -- or excuse me -- \$50,010 made on September 15 20th of 2022. Do you see that first one? 16 MR. CHOUDHRI: Objection, form. 17 A. Yes. 18 Q. (BY MR. BALLASES:) Okay. Can you tell the 19 Judge where that money originated from? 20 MR. CHOUDHRI: Objection, form. 21 A. I don't remember. 22 MR. CHOUDHRI: Do I need a mic or I'm 23 okay? 24 Q. (BY MR. BALLASES:) Okay. 25 MR. CHOUDHRI: Are you getting my</p>	<p style="text-align: right;">Page 65</p> <p>1 A. Yeah. 2 Q. (BY MR. BALLASES:) Okay. Can you tell the 3 Court from where this 1.9 million originated from? 4 MR. CHOUDHRI: Objection, form. 5 A. I don't remember. 6 Q. (BY MR. BALLASES:) Okay. Can you -- do you 7 have a recollection of making this particular \$1.9 8 million deposit into this account? 9 MR. CHOUDHRI: Objection, form. 10 A. I don't. 11 Q. (BY MR. BALLASES:) Okay. It's okay. 12 If you go a little bit further down, there's 13 a debit -- it says "other debits" and it also shows on 14 September 20th a one-million-dollar or \$1,000,010 15 checking withdrawal from this same account. 16 MR. CHOUDHRI: Objection, form. 17 Q. (BY MR. BALLASES:) And this is the same bank 18 statement, which is October 13th, 2023. Do you see 19 that entry? 20 A. Yes. 21 MR. CHOUDHRI: Objection, form. 22 Q. (BY MR. BALLASES:) Do you remember 23 withdrawing a little over a million dollars on 24 September 20th from this bank account? 25 MR. CHOUDHRI: Objection, form.</p>

<p style="text-align: right;">Page 66</p> <p>1 A. I don't.</p> <p>2 Q. (BY MR. BALLASES:) You don't remember</p> <p>3 withdrawing --</p> <p>4 MS. HOOD: Was it, I don't remember --</p> <p>5 A. I don't remember.</p> <p>6 MS. HOOD: Okay. Thank you.</p> <p>7 Q. (BY MR. BALLASES:) And then it shows one</p> <p>8 entry down on October 3rd of 2022, it shows \$747,000</p> <p>9 payment to Fidelity National Title Insurance, and it</p> <p>10 references "Shepherd-Huldy Development"; do you see</p> <p>11 that?</p> <p>12 MR. CHOUDHRI: Objection, form.</p> <p>13 A. Yes.</p> <p>14 Q. (BY MR. BALLASES:) Okay. Can you tell the</p> <p>15 Court why this \$747,000 was paid to Fidelity National</p> <p>16 Title Agency?</p> <p>17 MR. CHOUDHRI: Objection, form.</p> <p>18 A. I don't remember.</p> <p>19 Q. (BY MR. BALLASES:) Okay. Did you authorize</p> <p>20 this payment to come out of your account?</p> <p>21 MR. CHOUDHRI: Objection, form.</p> <p>22 A. I don't remember.</p> <p>23 Q. (BY MR. BALLASES:) Okay. If we turn to the</p> <p>24 bank statement that is December 9th, 2022. And I'll</p> <p>25 get it for you real quick. Oops. Missed it. Here you</p>	<p style="text-align: right;">Page 68</p> <p>1 Here you go.</p> <p>2 Okay. So still looking at Exhibit 25, it is</p> <p>3 your Cadence Bank bank statements from Account No.</p> <p>4 79714333. There are a couple of -- there's one entry I</p> <p>5 want to discuss on here.</p> <p>6 It shows a debit made on January 30th of 2023</p> <p>7 in the amount of \$2,551,000 to Heritage Title</p> <p>8 Commercial of Austin. And it references a GF number</p> <p>9 and then says "JPB, PBAC 507"; do you see that?</p> <p>10 A. Yes.</p> <p>11 MR. CHOUDHRI: Objection, form.</p> <p>12 Q. (BY MR. BALLASES:) Can you tell the Court</p> <p>13 where this \$2.551 million payment was made to Heritage</p> <p>14 Title Commercial of Austin?</p> <p>15 MR. CHOUDHRI: Objection, form.</p> <p>16 A. I don't remember.</p> <p>17 Q. (BY MR. BALLASES:) Okay. Did you authorize</p> <p>18 this 2.5 some-odd million-dollar payment to be made out</p> <p>19 of your personal account?</p> <p>20 MR. CHOUDHRI: Objection, form.</p> <p>21 A. I don't know.</p> <p>22 Q. (BY MR. BALLASES:) Okay. Do you recall or</p> <p>23 you don't recall?</p> <p>24 MR. CHOUDHRI: Objection, form.</p> <p>25 A. No. I don't want to -- I don't know about</p>
<p style="text-align: right;">Page 67</p> <p>1 go. There you go.</p> <p>2 So still looking at Exhibit 25, which is your</p> <p>3 Cadence Bank bank account or one of your Cadence Bank</p> <p>4 bank accounts, Account No. 79714333, I see a debit on</p> <p>5 the December 9th, 2022 statement of half a million</p> <p>6 dollars to "Romspen US Master Mortgage LP"; do you see</p> <p>7 that?</p> <p>8 MR. CHOUDHRI: Objection, form.</p> <p>9 A. Yes.</p> <p>10 Q. (BY MR. BALLASES:) Right here.</p> <p>11 A. Okay.</p> <p>12 Q. Okay. My question is to you, Ms. Choudhri,</p> <p>13 do you have a recollection of why this</p> <p>14 half-a-million-dollar payment to Romspen was made?</p> <p>15 MR. CHOUDHRI: Objection, form.</p> <p>16 A. I don't remember.</p> <p>17 Q. (BY MR. BALLASES:) Okay. Did you authorize</p> <p>18 this half a million dollars to come out of this</p> <p>19 account, your personal account, to go to Romspen?</p> <p>20 MR. CHOUDHRI: Objection, form.</p> <p>21 MS. HOOD: Objection, form.</p> <p>22 A. I don't remember.</p> <p>23 Q. (BY MR. BALLASES:) Okay. If you turn to the</p> <p>24 February 9th, 2023 bank statement within Exhibit 25,</p> <p>25 I'll get it for you. I keep going one too far here.</p>	<p style="text-align: right;">Page 69</p> <p>1 anything.</p> <p>2 Q. (BY MR. BALLASES:) Okay. Of course, you've</p> <p>3 never done business with PBAC 507 Holdings, LLC; isn't</p> <p>4 that right?</p> <p>5 MR. CHOUDHRI: Objection, form.</p> <p>6 A. I don't know.</p> <p>7 Q. (BY MR. BALLASES:) Okay.</p> <p>8 MS. HOOD: She said I don't know or I</p> <p>9 don't remember?</p> <p>10 Ms. Choudhri, is it "I don't know" or</p> <p>11 "I don't remember," your answer you just said? Is it</p> <p>12 "I don't know" or "I don't remember"?</p> <p>13 MR. BALLASES: I'll repeat the</p> <p>14 question.</p> <p>15 MS. HOOD: Okay.</p> <p>16 Q. (BY MR. BALLASES:) So --</p> <p>17 MR. CHOUDHRI: Her question was, is</p> <p>18 your answer "I don't know" or "I don't remember"</p> <p>19 because it wasn't clear.</p> <p>20 MR. BALLASES: So let me re-ask the</p> <p>21 question.</p> <p>22 Q. (BY MR. BALLASES:) So PBAC 507 Holdings, LLC,</p> <p>23 you don't have a recollection of ever doing business</p> <p>24 with that company; isn't that right?</p> <p>25 A. No. I don't know. I don't remember.</p>

<p style="text-align: right;">Page 70</p> <p>1 Q. Okay. Are you familiar that PBAC or do you</p> <p>2 know that PBAC 507 Holdings, LLC, is a company that Ali</p> <p>3 Choudhri is a member of?</p> <p>4 A. I don't remember.</p> <p>5 MR. CHOUDHRI: Objection, form.</p> <p>6 Q. (BY MR. BALLASES:) Okay. If you turn to</p> <p>7 Exhibit 27 of your deposition. Okay. Exhibit 27 to</p> <p>8 your deposition are more Cadence Bank statements. This</p> <p>9 one is for Account No. 0076620. Do you see that?</p> <p>10 MR. CHOUDHRI: Objection, form.</p> <p>11 A. Yes.</p> <p>12 Q. (BY MR. BALLASES:) Okay. And this account is</p> <p>13 in the name of yourself and Mr. Ali Choudhri, correct?</p> <p>14 MR. CHOUDHRI: Objection, form.</p> <p>15 A. Yes.</p> <p>16 Q. (BY MR. BALLASES:) Okay. I would like for</p> <p>17 you to turn to the statement in Exhibit 27, that is</p> <p>18 dated April 22nd, 2019. And I can help you. April</p> <p>19 22nd, 2019. There you go.</p> <p>20 All right. April 22nd, 2019, there are a</p> <p>21 couple of entries that I wanted to ask you about.</p> <p>22 The first one -- well, strike that.</p> <p>23 So you see this is a statement dated April</p> <p>24 22nd, 2019?</p> <p>25 MR. CHOUDHRI: Objection, form.</p>	<p style="text-align: right;">Page 72</p> <p>1 bank statement that is labeled May 22nd, 2019, there is</p> <p>2 a credit listed of \$90,000 that was made on May 20th of</p> <p>3 2019 for "BDFI, LLC"; do you see that?</p> <p>4 A. Yes.</p> <p>5 MR. CHOUDHRI: Objection, form.</p> <p>6 Q. (BY MR. BALLASES:) Okay. Do you have any --</p> <p>7 strike that.</p> <p>8 Can you tell the Court why that \$90,000</p> <p>9 payment was made to BDFI, LLC?</p> <p>10 MR. CHOUDHRI: Objection, form.</p> <p>11 A. I don't know.</p> <p>12 MS. HOOD: Again, is it "I don't know"</p> <p>13 or "I don't remember"?</p> <p>14 Ms. Choudhri, is your answer is "I</p> <p>15 don't know" or "I don't remember"?</p> <p>16 THE WITNESS: Okay.</p> <p>17 MS. HOOD: No, no, no. Which one is</p> <p>18 it, "I don't know" or "I don't remember"?</p> <p>19 MR. BALLASES: She said "I don't</p> <p>20 know."</p> <p>21 MS. HOOD: Okay. But I'm trying --</p> <p>22 Okay. But every time she says, "I don't know," I think</p> <p>23 she means "I don't remember." I'm just trying to</p> <p>24 clarify the record because I don't want you coming back</p> <p>25 and putting words in her mouth. Right?</p>
<p style="text-align: right;">Page 71</p> <p>1 A. Yes.</p> <p>2 Q. (BY MR. BALLASES:) Okay. And the first entry</p> <p>3 I want to ask you about is a debit and it's dated March</p> <p>4 26th of 2019, and it shows \$30,000 and it says "Jetall</p> <p>5 Companies, Inc., Operating"; do you see that entry?</p> <p>6 MR. CHOUDHRI: Objection, form.</p> <p>7 A. Yes.</p> <p>8 Q. (BY MR. BALLASES:) Okay. Do you have any</p> <p>9 idea what that \$30,000 payment was for?</p> <p>10 MR. CHOUDHRI: Objection, form.</p> <p>11 A. I don't know.</p> <p>12 Q. (BY MR. BALLASES:) Did you authorize that</p> <p>13 payment to be made?</p> <p>14 A. I don't know.</p> <p>15 MR. CHOUDHRI: Objection, form.</p> <p>16 MS. HOOD: Again, is it "I don't know"</p> <p>17 or "I don't remember"? I want to make the record</p> <p>18 clear.</p> <p>19 Do you not remember --</p> <p>20 THE WITNESS: I don't remember. I</p> <p>21 don't know.</p> <p>22 MS. HOOD: Okay.</p> <p>23 Q. (BY MR. BALLASES:) Okay. If you turn to May</p> <p>24 22nd, 2019, that bank statement. Okay. There you go.</p> <p>25 So staying within Exhibit 27, turning to the</p>	<p style="text-align: right;">Page 73</p> <p>1 MR. BALLASES: I'm just --</p> <p>2 MS. HOOD: Is it -- is it you don't</p> <p>3 know or you don't remember?</p> <p>4 THE WITNESS: Okay.</p> <p>5 MS. HOOD: No, no. Don't "okay" me.</p> <p>6 Is it -- is your answer "I don't know" or "I don't</p> <p>7 remember"? Is it "I don't remember"?</p> <p>8 THE WITNESS: I don't remember.</p> <p>9 MS. HOOD: Okay.</p> <p>10 Q. (BY MR. BALLASES:) Okay. So as you sit here</p> <p>11 today, can you tell the Court whether or not you</p> <p>12 particularly -- you, specifically, authorized this</p> <p>13 \$90,000 payment --</p> <p>14 MR. CHOUDHRI: Objection, form.</p> <p>15 Q. (BY MR. BALLASES:) -- to be made to BDI --</p> <p>16 BDFI, LLC, from this account?</p> <p>17 MR. CHOUDHRI: Objection, form.</p> <p>18 A. I don't remember.</p> <p>19 Q. (BY MR. BALLASES:) Okay. Okay. If you turn</p> <p>20 to the April 22nd, 2020 statement of Exhibit 27 -- went</p> <p>21 too far again. Here you go.</p> <p>22 Okay. So still looking at Exhibit 27, which</p> <p>23 is a Cadence Bank bank account with you and Ali</p> <p>24 Choudhri, Account No. 0076620. On the April 22nd, 2020</p> <p>25 statement, there is a deposit on April 6th of 2020 of</p>



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<p style="text-align: right;">Page 74</p> <p>1 \$160,000 from "VGRP Holdings, LLC"; do you see that</p> <p>2 entry?</p> <p>3 MR. CHOUDHRI: Objection, form.</p> <p>4 A. Yes.</p> <p>5 Q. (BY MR. BALLASES:) Okay. Can you tell the</p> <p>6 Court from where this \$160,000 originated?</p> <p>7 MR. CHOUDHRI: Objection, form.</p> <p>8 A. I don't know about it.</p> <p>9 Q. (BY MR. BALLASES:) Okay. Can you tell the</p> <p>10 Court why it was made?</p> <p>11 A. I don't remember.</p> <p>12 MR. CHOUDHRI: Objection, form.</p> <p>13 Q. (BY MR. BALLASES:) Okay. So could you turn</p> <p>14 to -- staying within Exhibit 27, could you turn to the</p> <p>15 bank statement that is dated June 19th, 2020. I can</p> <p>16 help you find it. There you go.</p> <p>17 So, Ms. Choudhri, on this particular bank</p> <p>18 statement there is a deposit or credit that was made on</p> <p>19 June 17th of 2020 in the amount of \$87,129.38 from</p> <p>20 "Greenville Tower Medical Investors." It says "Final</p> <p>21 Distribution"; do you see that?</p> <p>22 MR. CHOUDHRI: Objection, form.</p> <p>23 A. Yes.</p> <p>24 Q. (BY MR. BALLASES:) Okay. Can you tell the</p> <p>25 Court why this \$87,000 deposit was made?</p>	<p style="text-align: right;">Page 76</p> <p>1 MS. HOOD: Because you don't remember?</p> <p>2 THE WITNESS: I don't remember even.</p> <p>3 MS. HOOD: Okay. Well, you need to be</p> <p>4 clear when you answer his questions. Okay.</p> <p>5 THE WITNESS: Okay. I will.</p> <p>6 MS. HOOD: Okay.</p> <p>7 MR. BALLASES: For the record, I think</p> <p>8 you're doing great.</p> <p>9 MS. HOOD: For the record, you're not</p> <p>10 being fair to her, but keep going.</p> <p>11 MR. BALLASES: Objection, sidebar.</p> <p>12 MS. HOOD: I object to your sidebars.</p> <p>13 That's all you've been doing.</p> <p>14 Q. (BY MR. BALLASES:) If you -- staying within</p> <p>15 Exhibit 27, if you could turn to the --</p> <p>16 MS. HOOD: Okay. We're taking a</p> <p>17 break. It's at 35 minutes.</p> <p>18 MR. BALLASES: Okay.</p> <p>19 THE VIDEOGRAPHER: Off the record at</p> <p>20 12:55.</p> <p>21 (Off the record.)</p> <p>22 THE VIDEOGRAPHER: We are back on the</p> <p>23 record at 1:11.</p> <p>24 Q. (BY MR. BALLASES:) Okay. Hi, Ms. Choudhri,</p> <p>25 how are you?</p>
<p style="text-align: right;">Page 75</p> <p>1 MR. CHOUDHRI: Objection, form.</p> <p>2 A. I don't know.</p> <p>3 MS. HOOD: Again, is it "I don't know"</p> <p>4 or "I don't remember"?</p> <p>5 Ms. Choudhri, --</p> <p>6 MR. BALLASES: She said "I don't</p> <p>7 know," I mean.</p> <p>8 MR. CHOUDHRI: We're trying to</p> <p>9 clarify, Mr. Ballases.</p> <p>10 MR. BALLASES: I think it's very</p> <p>11 clear. I mean, y'all are trying to coach her.</p> <p>12 MS. HOOD: No, it's not --</p> <p>13 MR. CHOUDHRI: We're not --</p> <p>14 MS. HOOD: We're not trying to coach</p> <p>15 her. When she says "I don't know," I think she's</p> <p>16 saying "I don't remember."</p> <p>17 MR. BALLASES: Okay.</p> <p>18 MS. HOOD: And she's confusing me.</p> <p>19 Okay.</p> <p>20 So when he asked you a question, you</p> <p>21 say "I don't know," is it because you don't know or you</p> <p>22 don't remember?</p> <p>23 THE WITNESS: I don't know.</p> <p>24 MS. HOOD: You don't know?</p> <p>25 THE WITNESS: Yes.</p>	<p style="text-align: right;">Page 77</p> <p>1 A. I'm fine.</p> <p>2 Q. Good. We just took a short break. Are you</p> <p>3 ready to get started?</p> <p>4 A. Sure.</p> <p>5 Q. Okay. I'm trying to find the bank statement</p> <p>6 for you. Okay. Here we go.</p> <p>7 Okay. So when we left off, we were still</p> <p>8 talking about Exhibit 27, which are Cadence Bank</p> <p>9 statements for yourself and your son Ali Choudhri and</p> <p>10 specifically there for Account No. 0076620.</p> <p>11 MR. CHOUDHRI: Object to form.</p> <p>12 MS. HOOD: Object to form.</p> <p>13 Q. (BY MR. BALLASES:) If you turn to the</p> <p>14 statement dated January 22nd, 2021, within that set of</p> <p>15 documents which you have in front of you, I want to</p> <p>16 talk about a couple of deposits that were made.</p> <p>17 If you look down at the bottom of the page,</p> <p>18 there is a deposit that was made on December 31st of</p> <p>19 2020, and it was in the amount of 135,000 from "Harbor</p> <p>20 Healthcare SYS, LP" and it references "Fall Creek Plaza</p> <p>21 Settlement"; do you see that credit?</p> <p>22 MR. CHOUDHRI: Objection, form.</p> <p>23 A. Which one?</p> <p>24 Q. (BY MR. BALLASES:) The \$135,000 credit. Let</p> <p>25 me see. There you go. A page over.</p>



<p style="text-align: right;">Page 78</p> <p>1 MR. CHOUDHRI: Objection, form.</p> <p>2 Q. (BY MR. BALLASES:) Okay. So first page of</p> <p>3 the bank statement that is January 22nd, 2021 in</p> <p>4 Exhibit 27, there shows a deposit that was made on</p> <p>5 December 31st in the amount of 135,000 from Harbor</p> <p>6 Healthcare and there's a reference of Fall Creek Plaza</p> <p>7 Settlement. Do you see that amount?</p> <p>8 MR. CHOUDHRI: Objection, form.</p> <p>9 A. Yes.</p> <p>10 Q. (BY MR. BALLASES:) Okay. Can you tell the</p> <p>11 Court why that \$135,000 deposit was made into this</p> <p>12 account?</p> <p>13 MR. CHOUDHRI: Objection, form.</p> <p>14 A. I don't remember.</p> <p>15 Q. (BY MR. BALLASES:) Okay. Do you -- okay.</p> <p>16 The next entry down is also on December 31st of 2020,</p> <p>17 but this one's for half-a-million dollars and it's from</p> <p>18 also "Harbor Healthcare" and it references the "Fall</p> <p>19 Creek Plaza Settlement." Do you know what that</p> <p>20 half-million-dollar deposit into this account pertain</p> <p>21 to?</p> <p>22 MR. CHOUDHRI: Objection, form.</p> <p>23 A. I don't know.</p> <p>24 Q. (BY MR. BALLASES:) Okay. If you turn to the</p> <p>25 next page of that statement. So the second page, still</p>	<p style="text-align: right;">Page 80</p> <p>1 Q. (BY MR. BALLASES:) Okay. Can you tell the</p> <p>2 Court from where that money originated?</p> <p>3 MR. CHOUDHRI: Objection, form.</p> <p>4 A. I don't remember.</p> <p>5 Q. (BY MR. BALLASES:) Okay. Then I see another</p> <p>6 entry, it's five days later, on May 10th of 2021 of</p> <p>7 \$850,000 and this one says it's from -- or at least it</p> <p>8 indicates -- it's from Al Choudhri. Do you know what</p> <p>9 that deposit pertained to?</p> <p>10 MR. CHOUDHRI: Objection, form.</p> <p>11 A. I don't know about it.</p> <p>12 Q. (BY MR. BALLASES:) Okay. If you turn to the</p> <p>13 next page of that same statement, so it's Page 2 of the</p> <p>14 May 20 of 2021 statement, it shows a couple of debits.</p> <p>15 One is in the amount of \$850,006 and it was made on May</p> <p>16 3rd of 2021. Do you know what that withdrawal pertain</p> <p>17 to?</p> <p>18 MR. CHOUDHRI: Objection, form.</p> <p>19 A. I don't know.</p> <p>20 Q. (BY MR. BALLASES:) Did you authorize that</p> <p>21 withdrawal?</p> <p>22 A. I don't know.</p> <p>23 Q. Okay.</p> <p>24 MR. CHOUDHRI: Objection, form.</p> <p>25 MS. HOOD: Again, I want to be clear.</p>
<p style="text-align: right;">Page 79</p> <p>1 on the January 22nd, 2021 statement, there is a debit</p> <p>2 to "Jetall Companies" made on January 14th of 2021 in</p> <p>3 the amount of \$31,000. Do you see that entry?</p> <p>4 A. Yes.</p> <p>5 MR. CHOUDHRI: Objection, form.</p> <p>6 Q. (BY MR. BALLASES:) Okay. Did you -- do you</p> <p>7 know what that entry pertain to?</p> <p>8 MR. CHOUDHRI: Objection, form.</p> <p>9 A. No, I don't remember.</p> <p>10 Q. (BY MR. BALLASES:) Okay. Did you authorize</p> <p>11 that transfer to Jetall Companies?</p> <p>12 MR. CHOUDHRI: Objection, form.</p> <p>13 A. I don't know about it.</p> <p>14 Q. (BY MR. BALLASES:) Okay. If we turn to the</p> <p>15 May 20th, 2021 statement, I can get it for you.</p> <p>16 Okay. So still on Exhibit 27, looking at the</p> <p>17 statement dated May, 20th of 2021, there are a couple</p> <p>18 of entries that I want to talk about with you.</p> <p>19 I'll give you a second to put your glasses</p> <p>20 on.</p> <p>21 Okay. On that particular statement, there is</p> <p>22 a deposit or credit made on May 5th of 2021 in the</p> <p>23 amount of \$850,000. Do you see that deposit?</p> <p>24 MR. CHOUDHRI: Objection, form.</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 81</p> <p>1 When you say you don't remember, is that the same thing</p> <p>2 as "I don't know," because you need to be clear for the</p> <p>3 man to answer his questions.</p> <p>4 MR. BALLASES: Did she say "I don't</p> <p>5 know"?</p> <p>6 THE REPORTER: "I don't know" is what</p> <p>7 I have.</p> <p>8 MR. BALLASES: Yeah, that's what</p> <p>9 I thought.</p> <p>10 MS. HOOD: Okay. But do you not</p> <p>11 remember or do you not know? I'm just trying to make</p> <p>12 the record clear.</p> <p>13 THE WITNESS: Okay.</p> <p>14 MS. HOOD: All right.</p> <p>15 Q. (BY MR. BALLASES:) Okay. So shortly a little</p> <p>16 bit further down on that same page on May 5th of 2021,</p> <p>17 it shows an \$850,000 debit going to "Stewart Title</p> <p>18 Guaranty Company." Do you know what that money was</p> <p>19 sent for?</p> <p>20 MR. CHOUDHRI: Objection, form.</p> <p>21 A. I don't remember.</p> <p>22 Q. (BY MR. BALLASES:) Okay. Did you authorize</p> <p>23 that money to be sent?</p> <p>24 MR. CHOUDHRI: Objection, form.</p> <p>25 A. I don't remember.</p>

Shahnaz Choudhri  
November 25, 2024

82 to 85

<p style="text-align: right;">Page 82</p> <p>1 Q. (BY MR. BALLASES:) Okay. In 2021, when this 2 statement was made, you weren't working anymore, right? 3 MR. CHOUDHRI: Objection, form. 4 A. No. 5 Q. (BY MR. BALLASES:) You weren't working? 6 A. I don't remember. I know I don't -- I didn't 7 work. 8 Q. Yeah. Okay. 9 (Reporter clarification.) 10 MR. CHOUDHRI: For clarification, your 11 answer was, "I don't remember"? Is that correct? 12 THE WITNESS: Yes. 13 (Brief interruption.) 14 MS. HOOD: Sorry. 15 Q. (BY MR. BALLASES:) Okay. If you could turn 16 to the bank statement that is June 22nd of 2021, of 17 that same Exhibit 27. Okay. So still looking at 18 Exhibit 27, which is a Cadence Bank statement, Account 19 No. 0076620 for Shahnaz Choudhri and Ali Choudhri, and 20 turning specifically in that exhibit to the statement 21 dated June 22nd of 2021. 22 The question I have for you is, on that page 23 or on that bank statement on June 3rd there is a -- 24 June 3rd of 2021, there is a \$870,000 deposit into this 25 account. Can you tell the Court what that specific</p>	<p style="text-align: right;">Page 84</p> <p>1 Batch is? 2 MR. CHOUDHRI: Objection, form. 3 A. I don't know about it. I don't remember this 4 statement. 5 Q. (BY MR. BALLASES:) Okay. So you have no 6 knowledge of what Oasis Batch pertains to? 7 MR. CHOUDHRI: Objection, form. 8 MS. HOOD: Object to form. That 9 wasn't her answer. She said she doesn't remember. 10 MR. BALLASES: Okay. 11 MS. HOOD: Which is different. 12 Q. (BY MR. BALLASES:) Do you have any knowledge 13 as to what Oasis Batch pertains to? 14 MR. CHOUDHRI: Objection, form. 15 MS. HOOD: Objection. You've asked 16 the question. She's answered it. And now you're 17 trying to put words in her mouth. 18 A. I don't know. I don't remember. 19 Q. (BY MR. BALLASES:) Okay. If you turn to the 20 second page of that bank statement, which is a June 21 20th, 2021 bank statement, there is a debit in the 22 amount of \$172,046.49 that was made on June 17th of 23 2021 and paid to "CCI Holdings, LLC" and there's a 24 reference to "Shepherd Huldry" on that entry. Do you 25 see that?</p>
<p style="text-align: right;">Page 83</p> <p>1 deposit pertained to? 2 MR. CHOUDHRI: Objection, form. 3 A. I don't remember. 4 Q. (BY MR. BALLASES:) Do you know where it 5 originated from? 6 A. I don't remember. 7 MR. CHOUDHRI: Objection, form. 8 Q. (BY MR. BALLASES:) Okay. I see -- and we've 9 talked about this a little bit because I've seen these 10 on other bank statements, but on that same bank 11 statement there's "Oasis Batch, Payroll"; do you see 12 that entry? 13 MR. CHOUDHRI: Objection, form. 14 Q. (BY MR. BALLASES:) See, "Oasis Batch, 15 Payroll" and "Oasis Batch, Payroll." It's on there 16 twice. 17 MR. CHOUDHRI: Objection, form. 18 Q. (BY MR. BALLASES:) Do you see that? 19 A. Yes. 20 MR. CHOUDHRI: Objection, form. 21 Q. (BY MR. BALLASES:) Okay. So can you tell the 22 Court what those deposits pertain to? 23 MR. CHOUDHRI: Objection, form. 24 A. I don't remember. 25 Q. (BY MR. BALLASES:) Do you know what Oasis</p>	<p style="text-align: right;">Page 85</p> <p>1 MR. CHOUDHRI: Objection, form. 2 A. Yes. 3 Q. (BY MR. BALLASES:) Okay. Can you tell the 4 Court what this payment was for? 5 MR. CHOUDHRI: Objection, form. 6 A. I don't know. I don't remember it at all. 7 Q. (BY MR. BALLASES:) Okay. You had no 8 involvement with any entity known as Shepherd-Huldry? 9 MR. CHOUDHRI: Objection, form. 10 A. I don't remember. 11 Q. (BY MR. BALLASES:) Yeah. Okay. If you could 12 turn -- staying within Exhibit 27, if you could turn to 13 the bank statement that is dated November 19th, 2021. 14 Here you go. 15 Okay. This particular bank statement in 16 Exhibit 27 shows a deposit that was made on November, 17 12th, 2021 in the amount of \$9,483,411.74 from 18 "Transact Title" and it shows an entry of "Seller 19 Proceeds 1708 River O" is what it says. Do you see 20 that? 21 MR. CHOUDHRI: Objection, form. 22 A. Yes. 23 Q. (BY MR. BALLASES:) Okay. Can you tell the 24 Court where this money originated from? 25 MR. CHOUDHRI: Objection, form.</p>

<p style="text-align: right;">Page 86</p> <p>1 A. I don't remember at all.</p> <p>2 Q. (BY MR. BALLASES:) Okay. Could we turn to</p> <p>3 the -- in the Exhibit 27, the statement dated December</p> <p>4 20th of 2021, so the next statement over. Here you go.</p> <p>5 Okay. The statement dated December 20th of</p> <p>6 2021 in Exhibit 27, shows a deposit on December 14th of</p> <p>7 2021 of \$7 million from "Transact Title" and it says</p> <p>8 "Returning Buyer Funds." Do you see that?</p> <p>9 A. Yes.</p> <p>10 MR. CHOUDHRI: Objection, form.</p> <p>11 Q. (BY MR. BALLASES:) Can you tell the Court</p> <p>12 what that deposit pertained to?</p> <p>13 MR. CHOUDHRI: Objection, form.</p> <p>14 A. I don't remember.</p> <p>15 Q. (BY MR. BALLASES:) Okay. If you turn to the</p> <p>16 second page of that same December 20th, 2021 bank</p> <p>17 statement, there is a debit that was made on December</p> <p>18 15th of 2021 of \$3,584,669.23 that went to</p> <p>19 "Independence Title," and there's a GF number noted.</p> <p>20 Do you see that?</p> <p>21 MR. CHOUDHRI: Objection, form.</p> <p>22 A. Yes.</p> <p>23 Q. (BY MR. BALLASES:) Okay. Can you tell the</p> <p>24 Court what that payment was made for?</p> <p>25 MR. CHOUDHRI: Objection, form.</p>	<p style="text-align: right;">Page 88</p> <p>1 A. I don't remember at all.</p> <p>2 Q. (BY MR. BALLASES:) Okay. If we turn to the</p> <p>3 May 19, 2022 statement. Here we go. I'm going to tab</p> <p>4 this one just so in case it flips over, we know where</p> <p>5 we were. Okay.</p> <p>6 So within Exhibit 27, looking at the</p> <p>7 statement dated May 19th of 2022, there is a deposit</p> <p>8 and other credit of \$1 million that was made into this</p> <p>9 account on April 21st of 2022. Do you see that?</p> <p>10 MR. CHOUDHRI: Objection, form.</p> <p>11 A. Yes.</p> <p>12 Q. (BY MR. BALLASES:) Okay. Can you tell the</p> <p>13 Court from where that money originated?</p> <p>14 MR. CHOUDHRI: Objection, form.</p> <p>15 A. I don't remember.</p> <p>16 Q. (BY MR. BALLASES:) Okay. There is also a</p> <p>17 credit or deposit made on May 18th of 2022 on that bank</p> <p>18 statement in the amount of \$150,000 from "Benjamin</p> <p>19 Gubernick." Do you recall or do you know what that</p> <p>20 deposit pertained to?</p> <p>21 MR. CHOUDHRI: Objection, form.</p> <p>22 A. I don't remember.</p> <p>23 Q. (BY MR. BALLASES:) Okay. If you look at</p> <p>24 the -- a little bit further down that page, there was a</p> <p>25 debit or a transfer or payment that was made on April</p>
<p style="text-align: right;">Page 87</p> <p>1 A. I don't remember at all.</p> <p>2 Q. (BY MR. BALLASES:) Okay. On that same date,</p> <p>3 December 15th of 2021, there was also a \$5,029,527.91</p> <p>4 payment or transfer to "Capital Title of Texas, LLC";</p> <p>5 do you see that?</p> <p>6 A. Yes.</p> <p>7 MR. CHOUDHRI: Objection, form.</p> <p>8 Q. (BY MR. BALLASES:) Can you tell the Judge why</p> <p>9 that transfer of funds was made?</p> <p>10 MR. CHOUDHRI: Objection, form.</p> <p>11 A. I don't remember.</p> <p>12 Q. (BY MR. BALLASES:) Okay. If we turn to the</p> <p>13 January 21st, 2022 bank statement, next one over.</p> <p>14 There you go.</p> <p>15 Okay. On this page, still looking at Exhibit</p> <p>16 27, this is a statement dated January 21st, 2022.</p> <p>17 There is a deposit of that same number we just talked</p> <p>18 about. It was made on December 21st of '22. It's</p> <p>19 \$5,029,527.91 from Capital Title of Texas, LLC"; do you</p> <p>20 see that?</p> <p>21 A. Yes.</p> <p>22 MR. CHOUDHRI: Objection, form.</p> <p>23 Q. (BY MR. BALLASES:) Can you tell the Court why</p> <p>24 that money is now coming into the account?</p> <p>25 MR. CHOUDHRI: Objection, form.</p>	<p style="text-align: right;">Page 89</p> <p>1 21st of 2022 in the amount of half a million dollars</p> <p>2 for "Benchmark Title, LLC" and it references "Buyer</p> <p>3 Meandering Bend" and has a GF number. Do you see that?</p> <p>4 A. Yes.</p> <p>5 MR. CHOUDHRI: Objection, form.</p> <p>6 Q. (BY MR. BALLASES:) Okay. Do you know what</p> <p>7 that half-a-million-dollar payment related to?</p> <p>8 MR. CHOUDHRI: Objection, form.</p> <p>9 A. I don't remember.</p> <p>10 Q. (BY MR. BALLASES:) Okay. Did you authorize</p> <p>11 that payment to be made?</p> <p>12 MR. CHOUDHRI: Objection, form.</p> <p>13 A. No. I don't remember.</p> <p>14 Q. (BY MR. BALLASES:) Okay. If you turn to the</p> <p>15 next page of that statement, Page 2 of that statement,</p> <p>16 still on the May 19th, 2022 date, there is a debit or a</p> <p>17 payment that was made on April 25th of 2022. It was a</p> <p>18 half million dollars to "Austin San Gabriel Corner,</p> <p>19 LLC" and it has a GF number. Do you see that entry?</p> <p>20 A. Yes.</p> <p>21 MR. CHOUDHRI: Objection, form.</p> <p>22 Q. (BY MR. BALLASES:) Okay. Do you know what</p> <p>23 that payment was made for?</p> <p>24 MR. CHOUDHRI: Objection, form.</p> <p>25 A. I don't know. I don't know.</p>

<p style="text-align: right;">Page 90</p> <p>1 Q. (BY MR. BALLASES:) Okay. Did you authorize</p> <p>2 that payment?</p> <p>3 MR. CHOUDHRI: Objection, form.</p> <p>4 A. I don't remember.</p> <p>5 Q. (BY MR. BALLASES:) Okay. If we turn to the</p> <p>6 June 21st statement, which is two -- there you go.</p> <p>7 So looking at Exhibit 27, still looking at</p> <p>8 the now June 21st, 2022 bank statement, there is a</p> <p>9 credit or deposit of \$200,000 from "The Fit Foods LL"</p> <p>10 that was made on May 31st of 2022. Do you see that?</p> <p>11 A. Yes.</p> <p>12 MR. CHOUDHRI: Objection, form.</p> <p>13 Q. (BY MR. BALLASES:) Okay. Do you have a</p> <p>14 recollection of why that deposit was made?</p> <p>15 A. I don't remember.</p> <p>16 MR. CHOUDHRI: Objection, form.</p> <p>17 Q. (BY MR. BALLASES:) Okay. There are three</p> <p>18 other deposits that were made in the -- over the next</p> <p>19 few days, June 1st, June 2nd and June 3rd for different</p> <p>20 amounts that are reflected on this particular bank</p> <p>21 statement that's dated June 21st, 2022.</p> <p>22 MR. CHOUDHRI: Objection, form.</p> <p>23 Q. (BY MR. BALLASES:) Do you have -- do you know</p> <p>24 at all -- can you tell the Court why those deposits</p> <p>25 were made?</p>	<p style="text-align: right;">Page 92</p> <p>1 MR. CHOUDHRI: Objection, form.</p> <p>2 A. I don't know.</p> <p>3 Q. (BY MR. BALLASES:) Okay. And have you -- let</p> <p>4 me ask you this, have you ever had to hire Jennifer</p> <p>5 MacGeorge for any legal work?</p> <p>6 MR. CHOUDHRI: Objection, form.</p> <p>7 A. I don't know.</p> <p>8 Q. (BY MR. BALLASES:) Okay. If you look a</p> <p>9 little bit further down on that same bank statement,</p> <p>10 the July 22nd, 2022 bank statement, it shows a payment</p> <p>11 or a debit or a transfer on July 18th of 2022 of</p> <p>12 \$160,000 to "JLM Law, PLLC, Jennifer MacGeorge." Do</p> <p>13 you see that entry?</p> <p>14 A. Yes.</p> <p>15 MR. CHOUDHRI: Objection, form.</p> <p>16 Q. (BY MR. BALLASES:) Do you know what that</p> <p>17 payment was related to?</p> <p>18 A. I don't know.</p> <p>19 MR. CHOUDHRI: Objection, form.</p> <p>20 Q. (BY MR. BALLASES:) Did you authorize that</p> <p>21 payment to be made?</p> <p>22 A. I don't know.</p> <p>23 MR. CHOUDHRI: Objection, form.</p> <p>24 Q. (BY MR. BALLASES:) Okay. If you turn to the</p> <p>25 second page of that statement. Okay. On that same</p>
<p style="text-align: right;">Page 91</p> <p>1 MR. CHOUDHRI: Objection, form.</p> <p>2 A. I don't know at all.</p> <p>3 Q. (BY MR. BALLASES:) Okay. Does The Fit Foods,</p> <p>4 does that ring a bell to you at all? Do you have any</p> <p>5 recollection?</p> <p>6 A. Yes. I don't remember.</p> <p>7 MR. CHOUDHRI: Objection, form.</p> <p>8 Q. (BY MR. BALLASES:) Okay. Can you turn to the</p> <p>9 July 22nd -- there you go.</p> <p>10 If you look at the -- on Exhibit 27, the bank</p> <p>11 statement that is July 22nd, 2022, there is a deposit</p> <p>12 or credit that was made on June 24th of '22 in the</p> <p>13 amount of \$365,525.66 from "Hudson Title Group, LLC"</p> <p>14 and it says "Seller Proceeds Ali" and it says</p> <p>15 "C-H-O-U-D-H"; do you see that?</p> <p>16 MR. CHOUDHRI: Objection, form.</p> <p>17 A. Which one is?</p> <p>18 Q. (BY MR. BALLASES:) Go one over. There you</p> <p>19 go. 365. "Hudson Title Group." It says "Seller</p> <p>20 Proceeds Ali" and then it says "C-H-O-U-D-H." Do you</p> <p>21 see that?</p> <p>22 A. Yes.</p> <p>23 MR. CHOUDHRI: Objection, form.</p> <p>24 Q. (BY MR. BALLASES:) Okay. Do you know what</p> <p>25 this deposit pertained to?</p>	<p style="text-align: right;">Page 93</p> <p>1 bank statement dated July 22nd, 2022, there is a debit</p> <p>2 or a payment or transfer of -- you got it -- that was</p> <p>3 made on July 19th of 2022 and it shows a \$300,000</p> <p>4 payment or transfer to "Veritex Community Bank Loan</p> <p>5 OPS" and it says -- there's a reference that says "to</p> <p>6 further credit loan in the name of BDFI, LLC." Do you</p> <p>7 see that?</p> <p>8 MR. CHOUDHRI: Objection, form.</p> <p>9 A. Yes.</p> <p>10 Q. (BY MR. BALLASES:) Okay. Do you know what</p> <p>11 that \$300,000 transfer related to?</p> <p>12 MR. CHOUDHRI: Objection, form.</p> <p>13 A. I don't -- I don't recognize this.</p> <p>14 Q. (BY MR. BALLASES:) Okay. BDFI, LLC, do you</p> <p>15 recognize that?</p> <p>16 MR. CHOUDHRI: Objection, form.</p> <p>17 A. No.</p> <p>18 Q. (BY MR. BALLASES:) Okay. And if you see on</p> <p>19 that same date on that same statement on July 19th,</p> <p>20 2022, there was also a \$300,000 checking withdrawal.</p> <p>21 Do you know who withdrew that money, that \$300,000</p> <p>22 money?</p> <p>23 MR. CHOUDHRI: Objection, form.</p> <p>24 MS. HOOD: Object to form.</p> <p>25 A. I don't remember.</p>

<p style="text-align: right;">Page 94</p> <p>1 Q. (BY MR. BALLASES:) Okay. If you turn to the</p> <p>2 second page of the bank statement that is dated August</p> <p>3 22nd of 2022. I can help you here. Okay. Here is the</p> <p>4 second page, August 22nd, 2022.</p> <p>5 Okay. Still within Exhibit 27 and looking at</p> <p>6 the bank statement dated August 22nd, 2022 and</p> <p>7 specifically on the second page of that bank statement,</p> <p>8 there are several debits that I wanted to ask about.</p> <p>9 The first one is dated July 29th of 2022 and</p> <p>10 it's a \$200,000 payment to Hanif Jhaveri. And I'll</p> <p>11 spell it. It's J-H-A-V-E-R-I. Do you have a</p> <p>12 recollection of why this transfer was made to Hanif?</p> <p>13 MR. CHOUDHRI: Objection, form.</p> <p>14 MS. HOOD: Objection, form.</p> <p>15 A. I don't know. I don't remember at all.</p> <p>16 Q. (BY MR. BALLASES:) Okay. You didn't ever</p> <p>17 have to hire -- did you ever hire Anthony Buzbee, Tony</p> <p>18 Buzbee, for any legal work?</p> <p>19 MR. CHOUDHRI: Objection, form.</p> <p>20 A. I don't know.</p> <p>21 Q. (BY MR. BALLASES:) Okay. So this -- a little</p> <p>22 bit further down on that same page on August 1st, 2022,</p> <p>23 there's a \$50,000 payment to "Anthony G. Buzbee, LP."</p> <p>24 Do you know what that \$50,000 related to?</p> <p>25 A. I don't know.</p>	<p style="text-align: right;">Page 96</p> <p>1 made on September 20th of 2022 for \$2.8 million and it</p> <p>2 says "Ali Choudhri." Do you see that?</p> <p>3 MR. CHOUDHRI: Objection, form.</p> <p>4 A. Yes.</p> <p>5 Q. (BY MR. BALLASES:) Okay. Can you tell the</p> <p>6 Court from where that money originated or why it was</p> <p>7 deposited in this account?</p> <p>8 MR. CHOUDHRI: Objection, form.</p> <p>9 A. I don't recognize.</p> <p>10 Q. (BY MR. BALLASES:) Okay. If you turn to the</p> <p>11 next page, the second page of that same September 22nd,</p> <p>12 2022 statement, I see -- and we're looking at the</p> <p>13 debits now. And I see there is a entry on August 24th</p> <p>14 of 2022 in the amount of \$97,086 to A-V-I, R-E-D-D-Y,</p> <p>15 Avi Reddy, and it says "Loan payoff." Do you see that?</p> <p>16 MR. CHOUDHRI: Objection, form.</p> <p>17 A. Yes.</p> <p>18 Q. (BY MR. BALLASES:) Okay. Can you tell the</p> <p>19 Court what that payment pertained to?</p> <p>20 MS. HOOD: Object to form.</p> <p>21 A. I don't know.</p> <p>22 Q. (BY MR. BALLASES:) Okay.</p> <p>23 MR. CHOUDHRI: Objection, form.</p> <p>24 MS. HOOD: Again, is it you don't know</p> <p>25 or you don't remember? I want the record to be clear.</p>
<p style="text-align: right;">Page 95</p> <p>1 MR. CHOUDHRI: Objection, form.</p> <p>2 Q. (BY MR. BALLASES:) Okay. Also on that same</p> <p>3 page on August 4th of 2022, there's a \$50,000 payment</p> <p>4 to Jesse Mamuhewa. And I'll spell it. It's</p> <p>5 M-A-M-U-H-E-W-A. Do you know what that \$50,000 payment</p> <p>6 relates to?</p> <p>7 MR. CHOUDHRI: Objection, form.</p> <p>8 A. I don't -- I don't recognize this.</p> <p>9 Q. (BY MR. BALLASES:) Okay. And the last entry</p> <p>10 I want to talk about on that page is on August 19th of</p> <p>11 2022. It's a \$400,000 payment or transfer to "Romspen</p> <p>12 US Master Mortgage LP" and there's a note that says</p> <p>13 "Loan Extension." Do you see that?</p> <p>14 A. Yes.</p> <p>15 MR. CHOUDHRI: Objection, form.</p> <p>16 Q. (BY MR. BALLASES:) Do you know what that</p> <p>17 \$400,000 payment was made for?</p> <p>18 A. I can't recognize this.</p> <p>19 Q. (BY MR. BALLASES:) Okay. If we could turn to</p> <p>20 the September 22nd, 2022 bank statement. I'll help</p> <p>21 you.</p> <p>22 MR. CHOUDHRI: Objection, form.</p> <p>23 Q. (BY MR. BALLASES:) Okay. Looking at the</p> <p>24 first page of the September 22nd, 2022 bank statement</p> <p>25 and within Exhibit 27, there is a credit or deposit</p>	<p style="text-align: right;">Page 97</p> <p>1 Q. (BY MR. BALLASES:) Do you have any knowledge</p> <p>2 of why \$97,000- --</p> <p>3 MS. HOOD: Let me finish.</p> <p>4 Ms. Choudhri, --</p> <p>5 MR. BALLASES: It's not your</p> <p>6 deposition. I'm letting you do this.</p> <p>7 MS. HOOD: Okay. Thank you.</p> <p>8 MR. BALLASES: You're welcome.</p> <p>9 MS. HOOD: Bless your heart. Aren't</p> <p>10 you sweet?</p> <p>11 MR. BALLASES: I appreciate it. I am.</p> <p>12 MS. HOOD: No, you're not.</p> <p>13 For the record, --</p> <p>14 THE WITNESS: Yes. I don't remember.</p> <p>15 MS. HOOD: Okay. Thank you.</p> <p>16 Q. (BY MR. BALLASES:) Okay. So do you ever</p> <p>17 remember hiring an attorney Manfred Steinberg?</p> <p>18 A. Not at all.</p> <p>19 Q. (BY MR. BALLASES:) Okay. What about an</p> <p>20 attorney Steve Roberts? Did you ever hire --</p> <p>21 A. I don't know.</p> <p>22 Q. Okay. So there's a \$10,000 payment made to</p> <p>23 Manfred Steinberg on August 29th, 2022. Do you have --</p> <p>24 do you have any knowledge of that?</p> <p>25 A. No, I don't.</p>



<p style="text-align: right;">Page 98</p> <p>1 Q. Okay. There's also on August 29th, \$25,000</p> <p>2 payment or transfer made to "Steven A Roberts PC." It</p> <p>3 says "Legal Fees." Do you have any knowledge of that?</p> <p>4 MS. HOOD: Object to form.</p> <p>5 A. No, I don't remember.</p> <p>6 Q. (BY MR. BALLASES:) Okay. Also on August</p> <p>7 29th, 2022 there is a \$1 million checking -- there's a</p> <p>8 \$1 million withdrawal. Do you know about that</p> <p>9 particular withdrawal?</p> <p>10 MS. HOOD: Object to form.</p> <p>11 MR. CHOUDHRI: Objection, form.</p> <p>12 A. I don't remember.</p> <p>13 Q. (BY MR. BALLASES:) Okay. If we turn on to --</p> <p>14 let me see -- two pages further. Hold -- let's put a</p> <p>15 tab on this page. We're going to come back to it. But</p> <p>16 if we turn just a little bit further.</p> <p>17 There's some checks there associated with</p> <p>18 this bank statement and it shows the million-dollar</p> <p>19 withdrawal that's referenced that we just discussed.</p> <p>20 And it says that you made the withdrawal in the amount</p> <p>21 of a million dollars. Do you see that?</p> <p>22 MR. CHOUDHRI: Objection, form.</p> <p>23 A. Yes.</p> <p>24 Q. (BY MR. BALLASES:) Okay. Is that your</p> <p>25 signature on the withdrawal slip?</p>	<p style="text-align: right;">Page 100</p> <p>1 amount of \$50,010. And the other one is in the amount</p> <p>2 of \$2 million. Do you see that?</p> <p>3 MR. CHOUDHRI: Objection, form.</p> <p>4 A. Yes.</p> <p>5 Q. (BY MR. BALLASES:) Do you know what those two</p> <p>6 withdrawals pertain to?</p> <p>7 A. I don't remember.</p> <p>8 MR. CHOUDHRI: Objection, form.</p> <p>9 Q. (BY MR. BALLASES:) Okay. And if we turn back</p> <p>10 two pages forward to the check page, we can see that</p> <p>11 those two withdrawals -- I got this page. Yup. There</p> <p>12 you go.</p> <p>13 Okay. So we look at this particular page of</p> <p>14 this statement, it shows the \$2 million withdrawal and</p> <p>15 the \$50,000 withdrawal were made by -- by you. Do you</p> <p>16 see that?</p> <p>17 MR. CHOUDHRI: Objection, form.</p> <p>18 A. Yes.</p> <p>19 Q. (BY MR. BALLASES:) Does that jog your memory</p> <p>20 about what those pertain to?</p> <p>21 MR. CHOUDHRI: Objection, form.</p> <p>22 A. No, I don't know.</p> <p>23 MR. CHOUDHRI: Objection, form.</p> <p>24 Q. (BY MR. BALLASES:) Okay. Do you know what</p> <p>25 happened with that money?</p>
<p style="text-align: right;">Page 99</p> <p>1 MR. CHOUDHRI: Objection, form.</p> <p>2 MS. HOOD: Object to form.</p> <p>3 A. I don't remember.</p> <p>4 Q. (BY MR. BALLASES:) Okay. And then if we turn</p> <p>5 back to this page. If we look a little bit further</p> <p>6 down that page on August 31st, 2022, there is</p> <p>7 \$150,000 -- sorry. There's a \$150,000 debit on August</p> <p>8 31st, 2022 to "Romspen." It says "Mortgage Payment."</p> <p>9 Do you have any recollection of why that</p> <p>10 payment was made?</p> <p>11 MR. CHOUDHRI: Objection, form.</p> <p>12 A. I don't know about it.</p> <p>13 Q. (BY MR. BALLASES:) Okay. And then if we go a</p> <p>14 little bit further down that same page, there's a</p> <p>15 \$150,000 transfer made on September 16th to "Akin Gump</p> <p>16 Strauss Hauer &amp; Feld." Do you know what that transfer</p> <p>17 of funds was about?</p> <p>18 MR. CHOUDHRI: Objection, form.</p> <p>19 MS. HOOD: Objection, form.</p> <p>20 A. I don't know.</p> <p>21 Q. (BY MR. BALLASES:) Okay.</p> <p>22 MR. CHOUDHRI: Asked and answered.</p> <p>23 Q. (BY MR. BALLASES:) And then if we look a</p> <p>24 little bit further on the page, there's on September</p> <p>25 20th, 2022, there are two withdrawals. One is in the</p>	<p style="text-align: right;">Page 101</p> <p>1 MR. CHOUDHRI: Objection, form.</p> <p>2 A. I don't remember.</p> <p>3 Q. (BY MR. BALLASES:) Okay. If we turn to --</p> <p>4 we're done with this one.</p> <p>5 MS. HOOD: Thank God.</p> <p>6 MR. BALLASES: I know. It was too</p> <p>7 long.</p> <p>8 THE WITNESS: You don't need it?</p> <p>9 MR. BALLASES: No, we don't need that</p> <p>10 right now. You can move it right here. We might need</p> <p>11 it later, but I don't think we do right now.</p> <p>12 Okay. We're on 30, right? Yeah, 30</p> <p>13 is the next one.</p> <p>14 (Exhibit No. 30 marked.)</p> <p>15 Q. (BY MR. BALLASES:) Okay. Handing you now</p> <p>16 what is marked 30 to your deposition. You-all can</p> <p>17 decide who gets it. Okay. Exhibit 30 to your</p> <p>18 deposition is a Frost Bank statement that is in the</p> <p>19 name of yourself and Mobeen Naeem Choudhri. Do you see</p> <p>20 that?</p> <p>21 MR. CHOUDHRI: Objection, form.</p> <p>22 A. Yes.</p> <p>23 Q. (BY MR. BALLASES:) Okay. And you told us in</p> <p>24 your last deposition Mobeen Naeem Choudhri; that is</p> <p>25 your daughter, correct?</p>



<p style="text-align: right;">Page 102</p> <p>1 MR. CHOUDHRI: Objection, form.</p> <p>2 A. Yes.</p> <p>3 Q. (BY MR. BALLASES:) Okay.</p> <p>4 MR. CHOUDHRI: Mr. Ballases, is this a</p> <p>5 continuation of the deposition?</p> <p>6 MR. BALLASES: Sure.</p> <p>7 Q. (BY MR. BALLASES:) And so this particular --</p> <p>8 this particular account at Frost Bank is in the name</p> <p>9 of -- strike that.</p> <p>10 Is for Account No. 100686328. Do you see</p> <p>11 that?</p> <p>12 A. Yes.</p> <p>13 MR. CHOUDHRI: Objection, form.</p> <p>14 Q. (BY MR. BALLASES:) Okay. And it says that</p> <p>15 this particular account was opened on November 14th,</p> <p>16 2017. Do you see that?</p> <p>17 A. Yes.</p> <p>18 MR. CHOUDHRI: Objection, form.</p> <p>19 Q. (BY MR. BALLASES:) Okay. And then it notes</p> <p>20 under -- if you go a little bit further down the page</p> <p>21 under "Signer 2," it's got your name, "Shahnaz" -- and</p> <p>22 I'm going to -- can you tell me how to pronounce</p> <p>23 your -- your maiden name?</p> <p>24 A. Shahnaz Akhter Choudhri.</p> <p>25 Q. (BY MR. BALLASES:) Akhter. Okay. Shahnaz</p>	<p style="text-align: right;">Page 104</p> <p>1 just referenced in Exhibit 30. It says the account</p> <p>2 holders are "Mobeen Naeem Choudhri or Shahnaz Akhter</p> <p>3 Choudhri." Do you see that?</p> <p>4 MR. CHOUDHRI: Object to form.</p> <p>5 MS. HOOD: Object to form.</p> <p>6 Q. (BY MR. BALLASES:) Okay. And it's for the</p> <p>7 same Account No., which is 100686328. Do you see that?</p> <p>8 MR. CHOUDHRI: Objection, form.</p> <p>9 MS. HOOD: Object to form.</p> <p>10 Q. (BY MR. BALLASES:) Okay. And the date of</p> <p>11 this Account Selection Form Notice is November 19th,</p> <p>12 2020. Do you see that?</p> <p>13 A. Yes.</p> <p>14 MR. CHOUDHRI: Objection, form.</p> <p>15 Q. (BY MR. BALLASES:) Okay. And it indicates</p> <p>16 that it is a "Multi-Party Account With Right of</p> <p>17 Survivorship" under No. 4? Do you see that on the</p> <p>18 first page?</p> <p>19 MR. CHOUDHRI: Objection, form.</p> <p>20 Objection, form.</p> <p>21 Q. (BY MR. BALLASES:) Right there.</p> <p>22 A. Okay.</p> <p>23 Q. Okay. And do you recognize those initials?</p> <p>24 MR. CHOUDHRI: Objection, form.</p> <p>25 A. I don't remember.</p>
<p style="text-align: right;">Page 103</p> <p>1 Akhter Choudhri. And it says -- it says "Employer," it</p> <p>2 says "Jetalli Company," but then it says "Occupation</p> <p>3 Retired." Do you see that?</p> <p>4 MR. CHOUDHRI: Objection, form.</p> <p>5 A. Yes.</p> <p>6 Q. (BY MR. BALLASES:) Okay. So this is a bank</p> <p>7 account that is for you and your daughter only; is that</p> <p>8 right?</p> <p>9 MR. CHOUDHRI: Objection, form.</p> <p>10 A. I don't remember.</p> <p>11 Q. (BY MR. BALLASES:) Well, I mean, the account</p> <p>12 is only in the name of Mobeen Naeem Choudhri and</p> <p>13 yourself, right?</p> <p>14 A. Yes.</p> <p>15 MR. CHOUDHRI: Objection, form.</p> <p>16 MS. HOOD: Object to form.</p> <p>17 Q. (BY MR. BALLASES:) Okay. I'm now going to</p> <p>18 hand you Exhibit 31 to your deposition. This is a new</p> <p>19 exhibit.</p> <p>20 (Exhibit No. 31 marked.)</p> <p>21 MR. BALLASES: Here you go.</p> <p>22 There you go for y'all.</p> <p>23 Q. (BY MR. BALLASES:) Okay. Okay. Exhibit 31</p> <p>24 to your deposition is just a -- looks like it's a</p> <p>25 "Account Select Form Notice" for the same account we</p>	<p style="text-align: right;">Page 105</p> <p>1 Q. (BY MR. BALLASES:) Okay. If you turn to the</p> <p>2 second page of that exhibit.</p> <p>3 MR. CHOUDHRI: Objection, form.</p> <p>4 Q. (BY MR. BALLASES:) It's signed by -- it says</p> <p>5 "Mobeen Naeem Choudhri and Shahnaz Akhter Choudhri."</p> <p>6 Do you see that?</p> <p>7 A. Yes.</p> <p>8 MR. CHOUDHRI: Object to form.</p> <p>9 MS. HOOD: Object to form.</p> <p>10 Q. (BY MR. BALLASES:) Okay. I'm now going to</p> <p>11 hand you what is marked Exhibit 32 to your deposition.</p> <p>12 Here you go. This is a new exhibit.</p> <p>13 (Exhibit No. 32 marked.)</p> <p>14 MR. CHOUDHRI: Objection, form.</p> <p>15 Q. (BY MR. BALLASES:) Okay. So if you look at</p> <p>16 Exhibit 32 to your deposition, these are transfers,</p> <p>17 wire transfers, to and from the same account we just</p> <p>18 looked at.</p> <p>19 MR. CHOUDHRI: Objection, form.</p> <p>20 MS. HOOD: Objection, form.</p> <p>21 Q. (BY MR. BALLASES:) Do you recognize that?</p> <p>22 MR. CHOUDHRI: Objection, form.</p> <p>23 MS. HOOD: Objection, form.</p> <p>24 A. No.</p> <p>25 Q. (BY MR. BALLASES:) Okay. If you look at the</p>

<p style="text-align: right;">Page 106</p> <p>1 top left-hand corner, it's got the Account No.</p> <p>2 100686328. Do you see that?</p> <p>3 A. Yes.</p> <p>4 MR. CHOUDHRI: Objection, form.</p> <p>5 MS. HOOD: Object to form.</p> <p>6 Q. (BY MR. BALLASES:) Okay. And that's the same</p> <p>7 account number that we looked at for the last two</p> <p>8 exhibits, --</p> <p>9 MR. CHOUDHRI: Objection, form.</p> <p>10 MS. HOOD: Object to form.</p> <p>11 Q. (BY MR. BALLASES:) -- right?</p> <p>12 The same two account numbers that we have</p> <p>13 there and there?</p> <p>14 MR. CHOUDHRI: Objection, form.</p> <p>15 MS. HOOD: Objection, form.</p> <p>16 Q. (BY MR. BALLASES:) Okay. So I want to ask</p> <p>17 you about some of these transfers. If you look at the</p> <p>18 first page of Exhibit 32, there is a transfer in the</p> <p>19 amount of \$869,000 from your account here at Frost</p> <p>20 Bank. It says "Originator" right down there. It says</p> <p>21 "Orginator" is "Mobeen Naeem Choudhri or Shahnaz Akhter</p> <p>22 Choudhri."</p> <p>23 MR. CHOUDHRI: Objection, form.</p> <p>24 MS. HOOD: Object to form.</p> <p>25 A. This one?</p>	<p style="text-align: right;">Page 108</p> <p>1 well, strike that.</p> <p>2 Do you know what Caz Creek Holdings, LLC is?</p> <p>3 MR. CHOUDHRI: Objection, form.</p> <p>4 MS. HOOD: Object to form.</p> <p>5 A. I don't remember.</p> <p>6 Q. (BY MR. BALLASES:) Have you ever done</p> <p>7 business with Caz Creek Holdings, LLC?</p> <p>8 MS. HOOD: Object to form.</p> <p>9 MR. CHOUDHRI: Objection, form.</p> <p>10 A. I don't remember.</p> <p>11 Q. (BY MR. BALLASES:) Okay. Can you tell the</p> <p>12 Court why this \$869,000 went from your account to Caz</p> <p>13 Creek Holdings, LLC?</p> <p>14 MR. CHOUDHRI: Objection, form.</p> <p>15 A. Yes. I don't remember, I don't.</p> <p>16 MS. HOOD: Objection, form.</p> <p>17 Q. (BY MR. BALLASES:) Okay. Did you authorize</p> <p>18 this transfer to be made from your account to Caz Creek</p> <p>19 Holdings?</p> <p>20 A. I don't remember.</p> <p>21 MR. CHOUDHRI: Objection, form.</p> <p>22 MS. HOOD: Object to form.</p> <p>23 Q. (BY MR. BALLASES:) Okay. And you can see the</p> <p>24 send date on that at the top is -- it looks like August</p> <p>25 24th of 2021?</p>
<p style="text-align: right;">Page 107</p> <p>1 Q. (BY MR. BALLASES:) Yeah.</p> <p>2 MR. CHOUDHRI: Objection, form.</p> <p>3 MS. HOOD: Is there a question?</p> <p>4 MR. BALLASES: Yes.</p> <p>5 MS. HOOD: Because I can't tell who's</p> <p>6 testifying; you or her?</p> <p>7 MR. BALLASES: Yeah. Okay.</p> <p>8 MR. CHOUDHRI: Mr. Ballases, please</p> <p>9 stop testifying.</p> <p>10 Q. (BY MR. BALLASES:) Do you see the</p> <p>11 beneficiary?</p> <p>12 A. Yes.</p> <p>13 MR. CHOUDHRI: Objection, form.</p> <p>14 Q. (BY MR. BALLASES:) And the beneficiary is</p> <p>15 "Caz Creek Holdings, LLC"; do you see that?</p> <p>16 MS. HOOD: Object to form.</p> <p>17 MR. CHOUDHRI: Objection, form.</p> <p>18 A. Yes.</p> <p>19 Q. (BY MR. BALLASES:) Okay. Can you -- and if</p> <p>20 you go down a little bit further where it says "Bank to</p> <p>21 Bank Info: Purpose: Business Distribution"; do you</p> <p>22 see that?</p> <p>23 A. Yes.</p> <p>24 MS. HOOD: Object to form.</p> <p>25 Q. (BY MR. BALLASES:) Okay. Can you tell --</p>	<p style="text-align: right;">Page 109</p> <p>1 MR. CHOUDHRI: Objection, form.</p> <p>2 MS. HOOD: Same objection.</p> <p>3 MR. BALLASES: Okay.</p> <p>4 MS. HOOD: We're at 40 minutes.</p> <p>5 MR. BALLASES: Do you want to take a</p> <p>6 break?</p> <p>7 MS. HOOD: Yes.</p> <p>8 MR. BALLASES: Okay.</p> <p>9 THE VIDEOGRAPHER: Off the record at</p> <p>10 1:50.</p> <p>11 (Off the record.)</p> <p>12 THE VIDEOGRAPHER: We are back on the</p> <p>13 record at 2:11.</p> <p>14 Q. (BY MR. BALLASES:) Ms. Choudhri, we're back</p> <p>15 from a short break. Are you ready to get started?</p> <p>16 A. Yes, please.</p> <p>17 Q. Okay. Still looking at Exhibit 32 to your</p> <p>18 deposition.</p> <p>19 A. Uh-huh.</p> <p>20 Q. I'd like to turn to the page that is dated --</p> <p>21 has a send date at the top of November 22nd, 2022.</p> <p>22 MS. HOOD: Object to form.</p> <p>23 Q. (BY MR. BALLASES:) I can get to it for you.</p> <p>24 Okay. So looking at Exhibit 32 and looking</p> <p>25 at the wire statement that's got the send date of</p>

<p style="text-align: right;">Page 110</p> <p>1 November 22nd, 2022, do you see -- well, do you see 2 that page, first of all? 3 A. Yes. 4 MS. HOOD: Object to form. 5 Q. (BY MR. BALLASES:) Okay. On this particular 6 page, it shows that a wire was made from this account 7 where it says "Originator"; do you see that? 8 A. Yes. 9 MS. HOOD: Object to form. 10 Q. (BY MR. BALLASES:) Okay. And do you see a 11 little above that, it says the "Beneficiary"? 12 MS. HOOD: Object to form. 13 A. Yes. 14 Q. (BY MR. BALLASES:) Okay. And it shows the 15 "Beneficiary" as "Cazenovia Creek Funding II LLC"; do 16 you see that? 17 MS. HOOD: Object to form. 18 A. Yes. 19 Q. (BY MR. BALLASES:) Okay. You have not done 20 any business with Cazenovia Creek Funding II, LLC, have 21 you? 22 MS. HOOD: Object to form. 23 A. No. 24 Q. (BY MR. BALLASES:) Okay. And the amount of 25 that wire transfer from this account to Cazenovia is</p>	<p style="text-align: right;">Page 112</p> <p>1 Q. Okay. Do you see the wire out send date 2 statement that's dated January 30th of 2023? 3 MS. HOOD: Object to form. 4 A. Where is it? 5 Q. (BY MR. BALLASES:) Right there. 6 A. Okay. 7 Q. Okay. So this particular statement shows 8 that the originator, if you go down to the bottom where 9 it says "Originator," is your account, "Mobeen Naeem 10 Choudhri or Shahnaz Akhter Choudhri"; do you see that? 11 A. Yes. 12 MS. HOOD: Object to form. 13 Q. (BY MR. BALLASES:) Okay. And the 14 "Beneficiary" is "Heritage Title Company of Austin"; do 15 you see that? 16 A. Yes. 17 MS. HOOD: Object to form. 18 Q. (BY MR. BALLASES:) Okay. And if you look 19 down a little bit further at the bottom, it says, "Bank 20 to Bank Info: Purchase for business"; do you see that? 21 MS. HOOD: Object to form. 22 A. I don't remember. 23 Q. (BY MR. BALLASES:) So right down here it 24 says, "Bank to Bank Info" and it says "Purchase for 25 Business"; do you see that?</p>
<p style="text-align: right;">Page 111</p> <p>1 \$1,125,203.56. Do you see that? 2 MS. HOOD: Object to form. 3 A. Where is this? 4 Q. (BY MR. BALLASES:) Sure. Right there. The 5 amount. 6 A. Okay, yes. 7 Q. Okay. Could you tell the Court why this 8 1.125 some-odd million was wired from -- from this 9 particular account, from your account, to Cazenovia 10 Creek Funding? 11 MS. HOOD: Object to form. 12 A. I don't remember it. 13 Q. (BY MR. BALLASES:) Your daughter, Mobeen 14 Naeem Choudhri, she's a doctor, correct? 15 A. Yes. 16 Q. She has her own medical clinic? 17 A. Yes. 18 Q. Okay. She doesn't participate in real estate 19 deals with her brother? 20 A. No. 21 Q. Okay. If we turn to the wire statement 22 that's dated January 30th, has a send date of January 23 30th, 2023. I'll find it for you. I don't like when 24 they print these so small. 25 A. Uh-huh.</p>	<p style="text-align: right;">Page 113</p> <p>1 A. I want to verify these things. I don't 2 remember. 3 Q. Okay. So as you sit here today -- well, 4 let's get to the amount. 5 So the amount of this wire transfer from your 6 account was \$4 million. Do you see that? 7 MS. HOOD: Object to form. 8 A. Yes. 9 Q. (BY MR. BALLASES:) Okay. So can you tell the 10 Court why \$4 million was wired from your account to 11 Heritage Title Company of Austin? 12 A. I don't remember. 13 MS. HOOD: Object to form. 14 Q. (BY MR. BALLASES:) Okay. And if you noticed, 15 when it says "Originator to Beneficiary Info:," down 16 here at the bottom, it says "GF # JPB PBAX 507 17 Holdings, LLC"; do you see that? 18 A. Where it is? 19 MS. HOOD: Object to form. 20 Q. (BY MR. BALLASES:) Right here. 21 A. Yeah, okay. 22 Q. Right there. 23 A. Okay. 24 Q. So it says "Originator to Beneficiary Info." 25 A. Okay.</p>

<p style="text-align: right;">Page 114</p> <p>1 Q. Okay. You told us earlier in your deposition</p> <p>2 you've had no involvement with a company called PBAX,</p> <p>3 P-B-A-X, 507 Holdings, LLC. Do you recall that</p> <p>4 testimony?</p> <p>5 MS. HOOD: Object to form.</p> <p>6 A. I don't remember at all.</p> <p>7 Q. (BY MR. BALLASES:) Right. You've never done</p> <p>8 business with --</p> <p>9 A. No.</p> <p>10 MS. HOOD: Object to form.</p> <p>11 Q. (BY MR. BALLASES:) And you've told us when</p> <p>12 this wire took place in January of 2023, you weren't</p> <p>13 working, correct?</p> <p>14 A. Yeah.</p> <p>15 Q. Okay. If you turn to -- let's see. It's</p> <p>16 another wire statement. It's got the send date of</p> <p>17 April 28th, 2023. I'll find it for you.</p> <p>18 Okay. So we're now looking still at Exhibit</p> <p>19 32, which are wire statements from your Frost Bank</p> <p>20 account. And --</p> <p>21 MS. HOOD: Object to form.</p> <p>22 Q. (BY MR. BALLASES:) -- on this particular wire</p> <p>23 statement that is -- that shows the send date of April</p> <p>24 28th of 2023, it shows that a wire was made from this</p> <p>25 particular account. Do you see where it says</p>	<p style="text-align: right;">Page 116</p> <p>1 A. Yes.</p> <p>2 MS. HOOD: Object to form.</p> <p>3 Q. (BY MR. BALLASES:) Okay. As you sit here</p> <p>4 today, you cannot tell the Court why this \$244,000 and</p> <p>5 some-odd payment in April of '23 was made from your</p> <p>6 account to Bridgeco Financial, can you?</p> <p>7 MS. HOOD: Object to form.</p> <p>8 A. Yes. I don't recognize this.</p> <p>9 Q. (BY MR. BALLASES:) Okay. You certainly</p> <p>10 didn't authorize this, did you?</p> <p>11 A. I don't remember.</p> <p>12 MS. HOOD: Object to form.</p> <p>13 Q. (BY MR. BALLASES:) Okay. I want to stay</p> <p>14 within Exhibit 32, but I want to go to the wire</p> <p>15 statement that was dated October 27th, 2023. I'll find</p> <p>16 it for you. October 27, 2023.</p> <p>17 Okay. I'm now showing you a wire statement</p> <p>18 from Frost Bank that has the send date of October 27th,</p> <p>19 2023. Do you see that document?</p> <p>20 A. Yes.</p> <p>21 Q. Okay. And do you see that this was another</p> <p>22 wire payment and the Originator is your account. It</p> <p>23 says "Mobeen Naeem Choudhri or Shahnaz Akhter</p> <p>24 Choudhri"?</p> <p>25 MS. HOOD: Object to form.</p>
<p style="text-align: right;">Page 115</p> <p>1 "Originator"?</p> <p>2 MS. HOOD: Object to form.</p> <p>3 Q. (BY MR. BALLASES:) And it says "Mobeen Naeem</p> <p>4 Choudhri or Shahnaz Akhter Choudhri"?</p> <p>5 A. Yes.</p> <p>6 MS. HOOD: Object to form.</p> <p>7 Q. (BY MR. BALLASES:) Okay. And it shows the</p> <p>8 "Beneficiary" as "Bridgeco Financial, LLC"; do you see</p> <p>9 that?</p> <p>10 MS. HOOD: Object to form.</p> <p>11 A. Yes.</p> <p>12 Q. (BY MR. BALLASES:) You have never done any</p> <p>13 business with Bridgeco, have you?</p> <p>14 A. I don't remember.</p> <p>15 MS. HOOD: Object to form.</p> <p>16 Q. (BY MR. BALLASES:) Right. And it shows the</p> <p>17 amount is "\$244,923.29"; do you see that?</p> <p>18 MS. HOOD: Object to form.</p> <p>19 A. Yes.</p> <p>20 Q. (BY MR. BALLASES:) Okay. And if you go to</p> <p>21 the bottom again, it says "Bank to Bank Info." It says</p> <p>22 "Purpose: Deal of Property"; do you see that?</p> <p>23 MS. HOOD: Object to form.</p> <p>24 Q. (BY MR. BALLASES:) It says "Purpose: Deal of</p> <p>25 Property"; do you see that?</p>	<p style="text-align: right;">Page 117</p> <p>1 A. Yes.</p> <p>2 Q. (BY MR. BALLASES:) Okay. And it shows the</p> <p>3 "Beneficiary" is "Gibb, Dunn &amp; Crutcher LLP"; do you</p> <p>4 see that?</p> <p>5 MS. HOOD: Object to form.</p> <p>6 A. Where is?</p> <p>7 Q. (BY MR. BALLASES:) "Beneficiary," right</p> <p>8 there.</p> <p>9 A. Okay.</p> <p>10 Q. Okay. So it shows the "Beneficiary" as</p> <p>11 "Gibb, Dunn &amp; Crutcher, LLP"; do you see that?</p> <p>12 MS. HOOD: Object to form.</p> <p>13 A. Yes.</p> <p>14 Q. (BY MR. BALLASES:) Okay. Have you -- as you</p> <p>15 sit here today, have you ever had to hire the law firm</p> <p>16 of Gibson, Dunn &amp; Crutcher, LLP?</p> <p>17 MS. HOOD: Object to form.</p> <p>18 A. I don't remember.</p> <p>19 Q. (BY MR. BALLASES:) Okay. If you had to hire</p> <p>20 -- I think you've told us previously in your deposition</p> <p>21 that your only lawyer you recall hiring is Ms. Hood; is</p> <p>22 that right?</p> <p>23 MS. HOOD: Object to form.</p> <p>24 A. Yes.</p> <p>25 Q. (BY MR. BALLASES:) Okay. And if we look a</p>

<p style="text-align: right;">Page 118</p> <p>1 little bit higher on this bank -- on this wire</p> <p>2 statement, it shows that a wire in the amount of</p> <p>3 \$59,511 was wired out from this account. Do you see</p> <p>4 that?</p> <p>5 MS. HOOD: Object to form.</p> <p>6 A. What's --</p> <p>7 Q. (BY MR. BALLASES:) Yeah, there's a number,</p> <p>8 the amount.</p> <p>9 A. Oh, yes.</p> <p>10 Q. Yeah. See, it says "Amount" and then it's</p> <p>11 got the --</p> <p>12 A. Uh-huh.</p> <p>13 Q. Okay. So as you sit here today, can you tell</p> <p>14 the Court why this \$59,000 some-odd wire was made on</p> <p>15 October 27th, 2023 from your account to this particular</p> <p>16 law firm?</p> <p>17 MS. HOOD: Object to form.</p> <p>18 A. Yes. I can't recognize this at all.</p> <p>19 Q. (BY MR. BALLASES:) Okay. If we turn to --</p> <p>20 staying within Exhibit 32, but going to the wire</p> <p>21 statement dated October 31st of 2023, so we're looking</p> <p>22 at Halloween of last year. There you go.</p> <p>23 So looking at this particular wire payment</p> <p>24 from this account -- see, it says "Originator," and it</p> <p>25 says "Mobeen Naeem Choudhri or Shahnaz Akhter</p>	<p style="text-align: right;">Page 120</p> <p>1 A. Yes. I don't have a -- a problem memory, I</p> <p>2 don't remember.</p> <p>3 Q. (BY MR. BALLASES:) Yeah. Okay. If we turn</p> <p>4 to the same exhibit, Exhibit 32 and looking at the wire</p> <p>5 statement dated November 16th of 2023. And I'll find</p> <p>6 it for you to make it easy.</p> <p>7 Okay. So looking at the wire statement dated</p> <p>8 November 16th, 2023, it's another wire out from this</p> <p>9 account. And it says the "Originator" and it lists</p> <p>10 yourself and your daughter as the originators. Do you</p> <p>11 see that?</p> <p>12 A. Yes.</p> <p>13 MS. HOOD: Object to form.</p> <p>14 Q. (BY MR. BALLASES:) Okay. And it says the</p> <p>15 "Beneficiary" is "Jetall Croix Properties, LL- -- LP"</p> <p>16 -- excuse me. Do you see that?</p> <p>17 A. Yes.</p> <p>18 Q. Okay. And this wire transfer was in the</p> <p>19 amount of \$109,202.53. Do you see that?</p> <p>20 MS. HOOD: Object to form.</p> <p>21 A. Yes.</p> <p>22 Q. (BY MR. BALLASES:) Can you tell the Court why</p> <p>23 you wired 109,000 some-odd dollars to Jetall Croix</p> <p>24 Properties, LP, in November of '23?</p> <p>25 MS. HOOD: Object to form.</p>
<p style="text-align: right;">Page 119</p> <p>1 Choudhri"; do you see that?</p> <p>2 A. Yes.</p> <p>3 Q. Okay. And it shows the "Beneficiary" is</p> <p>4 "Akin Gump Strauss Hauer &amp; Feld LLP"; do you see that?</p> <p>5 A. Yes.</p> <p>6 MS. HOOD: Object to form.</p> <p>7 Q. (BY MR. BALLASES:) Right there.</p> <p>8 A. Okay.</p> <p>9 Q. Yeah, see "Beneficiary" there.</p> <p>10 A. Yes.</p> <p>11 Q. Okay. And you've told us you've never hired</p> <p>12 Akin Gump Strauss Hauer &amp; Feld, LLP, those lawyers,</p> <p>13 have you?</p> <p>14 MS. HOOD: Object to form.</p> <p>15 A. Yes. I don't remember at all.</p> <p>16 Q. (BY MR. BALLASES:) Yeah. And the amount of</p> <p>17 the wire transfer from this account is \$50,000. Do you</p> <p>18 see that?</p> <p>19 A. Yes.</p> <p>20 MS. HOOD: Object to form.</p> <p>21 Q. (BY MR. BALLASES:) As you sit here today, you</p> <p>22 cannot tell the Court why this \$50,000 payment from</p> <p>23 your account was made to the law firm of Akin Gump</p> <p>24 Strauss Hauer &amp; Feld, can you?</p> <p>25 MS. HOOD: Object to form.</p>	<p style="text-align: right;">Page 121</p> <p>1 A. I don't remember.</p> <p>2 Q. (BY MR. BALLASES:) Okay. If we turn now,</p> <p>3 staying in Exhibit 32, but turn to the wire statement</p> <p>4 that has a send date of February 26th of 2024. So just</p> <p>5 about a few months ago.</p> <p>6 Okay. So looking at the wire statement that</p> <p>7 has a send date of February 26th of 2024 in Exhibit 38,</p> <p>8 (sic) do you see this is another wire out from your</p> <p>9 account where Originator is stated?</p> <p>10 A. Yes.</p> <p>11 Q. Okay. And this wire is to -- the</p> <p>12 "Beneficiary" is "Jetall Companies"; do you see that?</p> <p>13 MS. HOOD: Object to form.</p> <p>14 Q. (BY MR. BALLASES:) Right there.</p> <p>15 A. Yeah.</p> <p>16 Q. Okay. And that is a wire of \$100,000 from</p> <p>17 your account to Jetall Companies; is that right?</p> <p>18 MS. HOOD: Object to form.</p> <p>19 A. I don't remember.</p> <p>20 Q. (BY MR. BALLASES:) Okay. Did you instruct</p> <p>21 your bank to this wire or do you not recall?</p> <p>22 MS. HOOD: Object to form.</p> <p>23 A. I don't remember.</p> <p>24 Q. (BY MR. BALLASES:) Okay. If you stay on</p> <p>25 Exhibit 32, but go to the wire send date of March 15th,</p>

<p style="text-align: right;">Page 122</p> <p>1 2024, which I can help you get to.</p> <p>2 Okay. So on Exhibit 32, looking at the wire</p> <p>3 statement that has a send date of March 15th, 2024, it</p> <p>4 shows another wire from your account. The "Originator"</p> <p>5 is "Mobeen Naeem Choudhri or Shahnaz Akhter Choudhri";</p> <p>6 do you see that?</p> <p>7 A. Yes.</p> <p>8 Q. Okay. The "Beneficiary" is "Holland &amp; Knight</p> <p>9 LP"; do you see that?</p> <p>10 MS. HOOD: Object to form.</p> <p>11 A. Yes.</p> <p>12 Q. (BY MR. BALLASES:) Right there.</p> <p>13 A. Okay.</p> <p>14 Q. Okay. And it says "Retainer Account" there.</p> <p>15 Do you see that right next to their name?</p> <p>16 A. Yes.</p> <p>17 MS. HOOD: Object to form.</p> <p>18 Q. (BY MR. BALLASES:) Okay. Have you ever had</p> <p>19 to hire a lawyer at the law firm of Holland &amp; Knight,</p> <p>20 LLP?</p> <p>21 MS. HOOD: Object to form.</p> <p>22 A. No.</p> <p>23 Q. (BY MR. BALLASES:) Okay. And it shows that</p> <p>24 the amount wired from your account to that law firm was</p> <p>25 \$30,000. Do you see that?</p>	<p style="text-align: right;">Page 124</p> <p>1 Q. Okay. Do you know what Select Portfolio</p> <p>2 Servicing, Inc., is?</p> <p>3 MS. HOOD: Object to form.</p> <p>4 A. Yes.</p> <p>5 Q. (BY MR. BALLASES:) Do you recognize the name</p> <p>6 Select Portfolio Servicing, Inc.?</p> <p>7 MS. HOOD: Object to form.</p> <p>8 MR. CHOUDHRI: Objection, form.</p> <p>9 A. Maybe there's a loan. I don't remember.</p> <p>10 Q. (BY MR. BALLASES:) Okay. Have you ever done</p> <p>11 business with Select Portfolio Servicing, Inc.?</p> <p>12 A. No. No.</p> <p>13 MR. CHOUDHRI: Objection, form.</p> <p>14 MS. HOOD: Object to form.</p> <p>15 Q. (BY MR. BALLASES:) Okay. And so you can see</p> <p>16 this wire was in the amount of \$17,191.98. Do you see</p> <p>17 that?</p> <p>18 A. Yes.</p> <p>19 MS. HOOD: Object to form.</p> <p>20 Q. (BY MR. BALLASES:) Okay. As you sit here</p> <p>21 today, you cannot tell the Court why this wire payment</p> <p>22 was made to Select Portfolio Servicing, Inc., can you?</p> <p>23 A. Yes.</p> <p>24 MR. CHOUDHRI: Object to form.</p> <p>25 MS. HOOD: Object to form.</p>
<p style="text-align: right;">Page 123</p> <p>1 MS. HOOD: Object to form.</p> <p>2 A. Okay.</p> <p>3 Q. (BY MR. BALLASES:) Okay. So as you sit here</p> <p>4 today, you cannot tell the Court why there was a wire</p> <p>5 made in March of 2024 for \$30,000 from your account to</p> <p>6 the law firm of Holland &amp; Knight, LLP, can you?</p> <p>7 MS. HOOD: Object to form.</p> <p>8 A. Yes. I don't recognize this.</p> <p>9 Q. (BY MR. BALLASES:) Okay. You didn't</p> <p>10 authorize this to be made?</p> <p>11 A. I don't remember.</p> <p>12 MS. HOOD: Object to form.</p> <p>13 Q. (BY MR. BALLASES:) Okay. Can you turn to the</p> <p>14 next wire statement. Okay. This one's March 20th of</p> <p>15 2024, still within Exhibit 32. It's another wire</p> <p>16 statement that has a send date of March 20th, 2024 and</p> <p>17 you can see the Originator is this account, it's your</p> <p>18 account with "Mobeen Naeem Choudhri or Shahnaz Akhter</p> <p>19 Choudhri"; do you see that?</p> <p>20 A. Yes.</p> <p>21 MS. HOOD: Object to form.</p> <p>22 Q. (BY MR. BALLASES:) Okay. And the</p> <p>23 "Beneficiary" is "Select Portfolio Servicing, Inc."; do</p> <p>24 you see that?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 125</p> <p>1 A. I can't. I don't remember.</p> <p>2 Q. (BY MR. BALLASES:) You didn't authorize this</p> <p>3 wire to be made, did you?</p> <p>4 A. I don't remember.</p> <p>5 MR. CHOUDHRI: Objection, form.</p> <p>6 MS. HOOD: Objection, form.</p> <p>7 Q. (BY MR. BALLASES:) Okay. And then if we turn</p> <p>8 to the same Exhibit 32, but if we turn to the wire</p> <p>9 statement that was made on April 12th of 2024. And</p> <p>10 I'll find it for you.</p> <p>11 So looking at Exhibit 32 at the wire</p> <p>12 statement that has a send date of April 12th of 2024.</p> <p>13 Do you see that?</p> <p>14 A. Yes.</p> <p>15 MR. CHOUDHRI: Objection, form.</p> <p>16 Q. (BY MR. BALLASES:) Okay. And this is another</p> <p>17 wire out of your account here at Frost, it says</p> <p>18 "Originator" and it lists the account number and it</p> <p>19 says "Mobeen Naeem Choudhri or Shahnaz Akhter</p> <p>20 Choudhri"; do you see that?</p> <p>21 MR. CHOUDHRI: Objection, form.</p> <p>22 MS. HOOD: Object to form.</p> <p>23 Q. (BY MR. BALLASES:) Okay. And it says the</p> <p>24 "Beneficiary" --</p> <p>25 THE REPORTER: I didn't get her</p>



<p style="text-align: right;">Page 126</p> <p>1 answer.</p> <p>2 I didn't get your answer. I'm sorry.</p> <p>3 MR. BALLASES: I'll ask again.</p> <p>4 Q. (BY MR. BALLASES:) So do you see,</p> <p>5 Ms. Choudhri, that the Originator for this particular</p> <p>6 wire transfer is this particular account, your account,</p> <p>7 at Frost Bank that we've been discussing?</p> <p>8 MR. CHOUDHRI: Objection to form.</p> <p>9 MS. HOOD: Object to form.</p> <p>10 A. Yes. I don't remember.</p> <p>11 Q. (BY MR. BALLASES:) Yeah, but do you see it's</p> <p>12 from your account?</p> <p>13 MR. CHOUDHRI: Objection, form.</p> <p>14 A. I don't know.</p> <p>15 Q. (BY MR. BALLASES:) Okay. Do you see that it</p> <p>16 shows your account number right there?</p> <p>17 A. Yes.</p> <p>18 MS. HOOD: Objection, form.</p> <p>19 MR. CHOUDHRI: Objection, form.</p> <p>20 Q. (BY MR. BALLASES:) And we looked earlier at</p> <p>21 Exhibit 30 and 31 and it had that same account number?</p> <p>22 A. Yes.</p> <p>23 MR. CHOUDHRI: Objection, form.</p> <p>24 MS. HOOD: Objection, form.</p> <p>25 Q. (BY MR. BALLASES:) Okay. And then it shows</p>	<p style="text-align: right;">Page 128</p> <p>1 MS. HOOD: Object to form. I object</p> <p>2 to your representation --</p> <p>3 MR. CHOUDHRI: Objection, form.</p> <p>4 MS. HOOD: -- of what this document</p> <p>5 is.</p> <p>6 Q. (BY MR. BALLASES:) Okay. So if we look at</p> <p>7 the first page of exhibit -- strike that.</p> <p>8 If we look at the -- the wire statement that</p> <p>9 has a send date of February 3rd of 2021, which I'll go</p> <p>10 to for you.</p> <p>11 Okay. So what you can see now in Exhibit 33</p> <p>12 is a wire statement dated February 3rd, 2021. Do you</p> <p>13 see that?</p> <p>14 A. Yes.</p> <p>15 MS. HOOD: Object to form.</p> <p>16 Q. (BY MR. BALLASES:) And here it shows that the</p> <p>17 originator of the wire, if you look at the bottom, is</p> <p>18 "Meandering Bend LLC"; do you see that?</p> <p>19 MS. HOOD: Object to form.</p> <p>20 MR. CHOUDHRI: Objection, form.</p> <p>21 A. Okay.</p> <p>22 Q. (BY MR. BALLASES:) Okay. So you see where it</p> <p>23 says "Originator" and "Meandering Bend LLC"?</p> <p>24 A. Yes.</p> <p>25 MR. CHOUDHRI: Objection, form.</p>
<p style="text-align: right;">Page 127</p> <p>1 that the "Beneficiary" is "Jetall Companies"; do you</p> <p>2 see that?</p> <p>3 A. Yes.</p> <p>4 MS. HOOD: Object to form.</p> <p>5 MR. CHOUDHRI: Objection, form.</p> <p>6 Q. (BY MR. BALLASES:) Okay. And then it shows</p> <p>7 the amount is \$30,000?</p> <p>8 MS. HOOD: Objection, form.</p> <p>9 MR. CHOUDHRI: Objection, form.</p> <p>10 Q. (BY MR. BALLASES:) Okay. So let me ask you,</p> <p>11 did you authorize this particular wire to be made from</p> <p>12 your account to Jetall Companies for \$30,000?</p> <p>13 A. Yes. I don't remember.</p> <p>14 MR. CHOUDHRI: Objection, form.</p> <p>15 MS. HOOD: Objection, form.</p> <p>16 Q. (BY MR. BALLASES:) Okay. I'm now going to</p> <p>17 hand you Exhibit 23 -- excuse me -- Exhibit 33 to your</p> <p>18 deposition. Here you go.</p> <p>19 (Exhibit No. 33 marked.)</p> <p>20 A. Okay.</p> <p>21 Q. (BY MR. BALLASES:) Okay. Ms. Choudhri, so</p> <p>22 I'll represent to you, these are wires into your Frost</p> <p>23 Bank account that we're going to discuss next. That is</p> <p>24 Exhibit 33. Do you see that?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 129</p> <p>1 Q. (BY MR. BALLASES:) Okay. And then it says</p> <p>2 the "Beneficiary" is this account, it lists this</p> <p>3 account, and it lists Mobeen Choudhri. Do you see</p> <p>4 that?</p> <p>5 A. Yes.</p> <p>6 MR. CHOUDHRI: Objection, form.</p> <p>7 MS. HOOD: Object to form.</p> <p>8 Q. (BY MR. BALLASES:) Okay. And the amount is</p> <p>9 one million dollars. Do you see that?</p> <p>10 MR. CHOUDHRI: Objection, form.</p> <p>11 A. Yes.</p> <p>12 Q. (BY MR. BALLASES:) Okay. Can you tell the</p> <p>13 Court as you sit here today why this one-million-dollar</p> <p>14 wire was made into your account that was made in</p> <p>15 February of 2021?</p> <p>16 MS. HOOD: Object to form.</p> <p>17 MR. CHOUDHRI: Objection, form.</p> <p>18 A. I don't remember at all.</p> <p>19 Q. (BY MR. BALLASES:) Okay. You've told us</p> <p>20 already that you never did business with or for</p> <p>21 Meandering Bend, LLC, do you remember?</p> <p>22 MS. HOOD: Object to form.</p> <p>23 MR. CHOUDHRI: Objection, form.</p> <p>24 Misstates the answer. She says "I don't remember."</p> <p>25 Q. (BY MR. BALLASES:) Do you even -- do you even</p>

<p style="text-align: right;">Page 130</p> <p>1 -- do you have any recollection of -- or have you --</p> <p>2 strike that.</p> <p>3 Have you ever heard of Meandering Bend, LLC,</p> <p>4 outside of this deposition?</p> <p>5 MR. CHOUDHRI: Objection, form.</p> <p>6 MS. HOOD: Objection, form.</p> <p>7 A. I don't remember.</p> <p>8 Q. (BY MR. BALLASES:) Okay. Are you familiar</p> <p>9 with Meandering Bend or do you know -- I think you</p> <p>10 don't know, but I want to ask. Do you know if</p> <p>11 Meandering Bend is Mr. -- is one of Mr. Ali Choudhri's</p> <p>12 businesses?</p> <p>13 A. I don't know.</p> <p>14 MR. CHOUDHRI: Objection to form.</p> <p>15 MS. HOOD: Object to form and the</p> <p>16 representation.</p> <p>17 Q. (BY MR. BALLASES:) Because I want to refresh</p> <p>18 your recollection, so if you look at Exhibit 34 to your</p> <p>19 deposition, this is a "Texas Franchise Tax Public</p> <p>20 Information Report"; do you see that?</p> <p>21 (Exhibit No. 34 marked.)</p> <p>22 A. Yes.</p> <p>23 MR. CHOUDHRI: Objection, form.</p> <p>24 Q. (BY MR. BALLASES:) It's from the year 2022.</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 132</p> <p>1 that -- this wire shows the "Originator" of the wire</p> <p>2 was a company called "PBAC 507 Holdings, LLC"; do you</p> <p>3 see that?</p> <p>4 MR. CHOUDHRI: Objection, form.</p> <p>5 A. Yes.</p> <p>6 Q. (BY MR. BALLASES:) Okay. And it says the</p> <p>7 "Beneficiary" is your account. It says the account</p> <p>8 number and it says "Shahnaz Choudhri"; do you see that?</p> <p>9 A. Yes.</p> <p>10 MS. HOOD: Object to form.</p> <p>11 Q. (BY MR. BALLASES:) Okay. And this transfer</p> <p>12 is in the amount of \$1 million. Do you see that?</p> <p>13 MR. CHOUDHRI: Objection, form.</p> <p>14 A. Yes.</p> <p>15 Q. (BY MR. BALLASES:) Okay. Do you have a</p> <p>16 recollection of why PBAC 507 Holdings, LLC, wired \$1</p> <p>17 million into your account on or about November 15th of</p> <p>18 2021?</p> <p>19 MR. CHOUDHRI: Objection, form.</p> <p>20 MS. HOOD: Objection, form.</p> <p>21 A. No, I don't remember.</p> <p>22 Q. (BY MR. BALLASES:) Okay. You've never done</p> <p>23 -- and you told us this before, but just so it's clear,</p> <p>24 you've never done any business with or for PBAC 507,</p> <p>25 have you?</p>
<p style="text-align: right;">Page 131</p> <p>1 MR. CHOUDHRI: Objection, form.</p> <p>2 Q. (BY MR. BALLASES:) Okay. And it's for the</p> <p>3 taxpayer name Meandering Bend, LLC?</p> <p>4 MR. CHOUDHRI: Objection, form.</p> <p>5 A. I don't know.</p> <p>6 Q. (BY MR. BALLASES:) Right there. Do you see</p> <p>7 that?</p> <p>8 A. Yes.</p> <p>9 Q. Okay. And if you look a little down under</p> <p>10 Section A, it says under name, it says "Ali Choudhri,</p> <p>11 manager"; do you see that?</p> <p>12 MR. CHOUDHRI: Objection, form.</p> <p>13 A. Yes.</p> <p>14 Q. (BY MR. BALLASES:) Okay. Getting back to</p> <p>15 Exhibit 33 and turning to the wire statement dated</p> <p>16 November 9th, 2022, I'll turn to it for you. Okay. So</p> <p>17 I jumped ahead of myself.</p> <p>18 If we could look at the wire statement dated</p> <p>19 11/15/22. Okay. So Exhibit 33 still we're looking at,</p> <p>20 it shows a wire statement date or send date of 11 --</p> <p>21 November 15, 2021. Do you see that at the top?</p> <p>22 MR. CHOUDHRI: Objection, form.</p> <p>23 MS. HOOD: Same objection.</p> <p>24 A. It is. Okay.</p> <p>25 Q. (BY MR. BALLASES:) Okay. And this one shows</p>	<p style="text-align: right;">Page 133</p> <p>1 A. Yes.</p> <p>2 MS. HOOD: Objection, form.</p> <p>3 MR. CHOUDHRI: Objection, form.</p> <p>4 That's not -- you're misstating the answer. Her answer</p> <p>5 was "I don't remember." Don't misstate the answer.</p> <p>6 MR. BALLASES: Object to form.</p> <p>7 Q. (BY MR. BALLASES:) So my recollection from</p> <p>8 your first deposition is that you've never done --</p> <p>9 MR. CHOUDHRI: I thought this was a</p> <p>10 continuation of the deposition, Mr. Ballases.</p> <p>11 Q. (BY MR. BALLASES:) My recollection from your</p> <p>12 first deposition is that you stated that you've never</p> <p>13 done business with or for PBAC 507 Holdings, LLC.</p> <p>14 A. Yes.</p> <p>15 MS. HOOD: Object to form.</p> <p>16 Q. (BY MR. BALLASES:) Okay. You don't know --</p> <p>17 you don't recognize that name?</p> <p>18 A. No. No.</p> <p>19 Q. Okay.</p> <p>20 MR. CHOUDHRI: Objection, form.</p> <p>21 Q. (BY MR. BALLASES:) So as you sit here today</p> <p>22 --</p> <p>23 MR. CHOUDHRI: You're misstating the</p> <p>24 testimony. Her testimony was she doesn't remember.</p> <p>25 You're misstating the --</p>

November 25, 2024

134 to 137

<p style="text-align: right;">Page 134</p> <p>1 MR. BALLASES: Please --</p> <p>2 MR. CHOUDHRI: -- testimony.</p> <p>3 MR. BALLASES: -- please object to the</p> <p>4 form of the objection as the rules require and you can</p> <p>5 take it up with the Judge.</p> <p>6 MR. CHOUDHRI: Objection, you're</p> <p>7 misstating the -- her answer from her prior deposition.</p> <p>8 MR. BALLASES: Okay.</p> <p>9 MR. CHOUDHRI: And this is a</p> <p>10 continuation of that deposition.</p> <p>11 Q. (BY MR. BALLASES:) Okay. So as you sit here</p> <p>12 today, you cannot tell Judge Norman why PBAC 507</p> <p>13 Holdings, LLC, wired \$1 million into your account</p> <p>14 around November of 2021?</p> <p>15 A. I don't remember it at all.</p> <p>16 MR. CHOUDHRI: Objection, form.</p> <p>17 Q. (BY MR. BALLASES:) Okay. If we turn to</p> <p>18 the -- staying within Exhibit 33, but we turn to the</p> <p>19 wire statement -- wire send date statement of 11,</p> <p>20 November, 9th, 2022. I'll find it for you to make it</p> <p>21 easy. Okay.</p> <p>22 Okay. So looking at the wire statement with</p> <p>23 the send date of November 9th, 2022, do you see that in</p> <p>24 front of you?</p> <p>25 MR. CHOUDHRI: Objection, form.</p>	<p style="text-align: right;">Page 136</p> <p>1 your account in or around November of 2022?</p> <p>2 A. I don't remember.</p> <p>3 MR. CHOUDHRI: Objection, form.</p> <p>4 MS. HOOD: Object to form.</p> <p>5 Q. (BY MR. BALLASES:) Okay. If we stay on</p> <p>6 Exhibit 33, but turn to the wire statement with the</p> <p>7 send date of December 14th, 2022. Okay.</p> <p>8 Okay. Ms. Choudhri, Exhibit 33 still we're</p> <p>9 now looking at the wire statement that has a send date</p> <p>10 of December 14th, 2022. Do you see that send date at</p> <p>11 the top?</p> <p>12 MS. HOOD: Object to form.</p> <p>13 A. Okay.</p> <p>14 Q. (BY MR. BALLASES:) Okay. Do you see that the</p> <p>15 Originator of this wire, if you look at the bottom</p> <p>16 where it says "Originator" is "Caz Creek Holdings,</p> <p>17 LLC"?</p> <p>18 MR. CHOUDHRI: Objection, form.</p> <p>19 MS. HOOD: Objection, form.</p> <p>20 Q. (BY MR. BALLASES:) Do you see that?</p> <p>21 A. Yes.</p> <p>22 Q. Okay. And the "Beneficiary" is this account?</p> <p>23 Do you see that?</p> <p>24 A. Yes.</p> <p>25 MR. CHOUDHRI: Objection, form.</p>
<p style="text-align: right;">Page 135</p> <p>1 A. Yeah.</p> <p>2 Q. (BY MR. BALLASES:) Okay. And it shows the</p> <p>3 "Originator" is -- the bottom of this wire is "Ali</p> <p>4 Choudhri"; do you see that?</p> <p>5 MR. CHOUDHRI: Objection, form.</p> <p>6 A. Oh, okay.</p> <p>7 Q. (BY MR. BALLASES:) Do you see it?</p> <p>8 A. Yes.</p> <p>9 Q. Okay. And it shows, by the way, his Account</p> <p>10 No. 7110232. Do you see that above his name?</p> <p>11 MR. CHOUDHRI: Objection, form.</p> <p>12 A. I don't know.</p> <p>13 Q. (BY MR. BALLASES:) Do you see that right</p> <p>14 above his name?</p> <p>15 A. Yeah.</p> <p>16 Q. Do you know what bank that is?</p> <p>17 A. I don't know.</p> <p>18 MS. HOOD: Objection, form.</p> <p>19 MR. CHOUDHRI: Objection, form.</p> <p>20 Q. (BY MR. BALLASES:) Okay. And the amount of</p> <p>21 this wire into this account is \$4,650,000"; do you see</p> <p>22 that?</p> <p>23 A. Yes.</p> <p>24 Q. Okay. As you sit here today, can you tell</p> <p>25 Judge Norman why Ali Choudhri wired 4.65 million into</p>	<p style="text-align: right;">Page 137</p> <p>1 Q. (BY MR. BALLASES:) Okay. And the amount of</p> <p>2 wire is 1.125 -- well, let me just say it. The amount</p> <p>3 of the wire is \$1,125,203.56. Do you see that?</p> <p>4 MR. CHOUDHRI: Objection, form.</p> <p>5 A. No. I don't know.</p> <p>6 Q. (BY MR. BALLASES:) Right there?</p> <p>7 A. No, I don't know.</p> <p>8 Q. Okay. But you see the amount of the wire --</p> <p>9 A. Yes.</p> <p>10 MR. CHOUDHRI: Objection, form.</p> <p>11 Q. (BY MR. BALLASES:) -- is \$1,125,203.56?</p> <p>12 A. Yes.</p> <p>13 Q. Okay. My question to you is, could you tell</p> <p>14 the Court why Caz Creek Holdings, LLC, was wiring about</p> <p>15 \$1.1 million into your account in December of 2022?</p> <p>16 MR. CHOUDHRI: Objection, form.</p> <p>17 MS. HOOD: Objection, form.</p> <p>18 A. I don't know.</p> <p>19 Q. (BY MR. BALLASES:) Okay. You've told us</p> <p>20 previously Caz Creek Holdings, LLC, you don't have any</p> <p>21 recollection of what that company is, do you?</p> <p>22 MR. CHOUDHRI: Objection, form.</p> <p>23 A. Yes. I don't remember.</p> <p>24 Q. (BY MR. BALLASES:) Yeah. Have you even heard</p> <p>25 of Caz Creek Holdings, LLC, aside from your deposition?</p>

<p style="text-align: right;">Page 138</p> <p>1 MR. CHOUDHRI: Objection, form.</p> <p>2 MS. HOOD: Objection, form. Asked and</p> <p>3 answered.</p> <p>4 A. No.</p> <p>5 Q. (BY MR. BALLASES:) Okay. Continuing on with</p> <p>6 Exhibit 33, but if we turn to the wire statement with</p> <p>7 the send date of January 30th, 2023.</p> <p>8 Okay. So still on Exhibit 33, looking at the</p> <p>9 wire statement with the send date of January 30th,</p> <p>10 2023, do you see that document?</p> <p>11 MR. CHOUDHRI: Objection, form.</p> <p>12 MS. HOOD: Objection, form.</p> <p>13 Q. (BY MR. BALLASES:) Okay. And this document,</p> <p>14 if you look at the bottom, it shows the "Originator" of</p> <p>15 this wire and it says the "Originator" is "Heritage</p> <p>16 Title Company of Austin Inc."; do you see that?</p> <p>17 MR. CHOUDHRI: Objection, form.</p> <p>18 MS. HOOD: Object to form.</p> <p>19 A. Yes. Oh, yes.</p> <p>20 Q. (BY MR. BALLASES:) Right there where it says</p> <p>21 "Originator."</p> <p>22 MR. CHOUDHRI: Objection, form.</p> <p>23 Q. (BY MR. BALLASES:) Okay. And the</p> <p>24 "Beneficiary" is this account. It says the Account No.</p> <p>25 100686328. Do you see that?</p>	<p style="text-align: right;">Page 140</p> <p>1 MR. CHOUDHRI: Objection, form.</p> <p>2 Q. (BY MR. BALLASES:) It's Valentine's Day.</p> <p>3 Okay. So looking at Exhibit 33 and the wire</p> <p>4 statement with the send date of February 14th, 2023; do</p> <p>5 you see that document?</p> <p>6 A. Yes.</p> <p>7 MR. CHOUDHRI: Objection, form.</p> <p>8 Q. (BY MR. BALLASES:) Okay. If you look at the</p> <p>9 bottom where it says the "Originator" it says the</p> <p>10 "Originator" is "Heritage Title Company of Austin,</p> <p>11 Inc."; do you see that?</p> <p>12 A. Yes.</p> <p>13 MR. CHOUDHRI: Objection, form.</p> <p>14 Q. (BY MR. BALLASES:) Okay. And it shows the</p> <p>15 "Beneficiary" and it shows your account number again?</p> <p>16 A. Yes.</p> <p>17 MR. CHOUDHRI: Objection, form.</p> <p>18 Q. (BY MR. BALLASES:) Okay. And it shows this</p> <p>19 wire amount is \$6,051,000. Do you see that?</p> <p>20 A. Yes.</p> <p>21 MS. HOOD: Objection, form.</p> <p>22 MR. CHOUDHRI: Objection, form.</p> <p>23 Q. (BY MR. BALLASES:) Can you tell the Court why</p> <p>24 this particular title company wired in excess of \$6</p> <p>25 million into your account in February of 2023?</p>
<p style="text-align: right;">Page 139</p> <p>1 MR. CHOUDHRI: Objection, form.</p> <p>2 A. Yes.</p> <p>3 Q. (BY MR. BALLASES:) Okay. And this wire from</p> <p>4 the title company was in the amount of half-a-million</p> <p>5 dollars. Do you see that?</p> <p>6 A. Yes.</p> <p>7 MR. CHOUDHRI: Objection, form.</p> <p>8 Q. (BY MR. BALLASES:) Okay. Can you tell the</p> <p>9 Court why Heritage Title Company wired half-a-million</p> <p>10 dollars into your account on January -- or in January</p> <p>11 of 2023?</p> <p>12 MR. CHOUDHRI: Objection, form.</p> <p>13 MS. HOOD: Objection, form.</p> <p>14 A. Yes. I don't remember.</p> <p>15 Q. (BY MR. BALLASES:) And you've told us in 2023</p> <p>16 you were retired?</p> <p>17 MR. CHOUDHRI: Objection, form.</p> <p>18 Misstates the answer. She never said that.</p> <p>19 MR. BALLASES: Please object to the</p> <p>20 form of your questions. Stick to the Rules.</p> <p>21 MR. CHOUDHRI: Objection, form.</p> <p>22 Sidebar.</p> <p>23 Q. (BY MR. BALLASES:) If you turn to -- stay on</p> <p>24 Exhibit 33, but turn to the wire statement with the</p> <p>25 send date of February 14th, 2023.</p>	<p style="text-align: right;">Page 141</p> <p>1 A. I don't know.</p> <p>2 MS. HOOD: Object to form.</p> <p>3 MR. CHOUDHRI: Objection, form.</p> <p>4 Q. (BY MR. BALLASES:) Okay. You at that time</p> <p>5 were retired, you weren't transacting business, were</p> <p>6 you?</p> <p>7 A. I don't remember at all.</p> <p>8 MR. CHOUDHRI: Objection, form.</p> <p>9 Q. (BY MR. BALLASES:) Yeah. If we could turn,</p> <p>10 staying in Exhibit 33, if we could turn to the wire</p> <p>11 statement dated February 26th of 2024. And I'll go to</p> <p>12 --</p> <p>13 MR. CHOUDHRI: Objection, form.</p> <p>14 Q. (BY MR. BALLASES:) -- it for you.</p> <p>15 Okay. So still within Exhibit 33, but</p> <p>16 looking at the wire statement with a send date of</p> <p>17 February 26th of 2024, so a few months ago. Do you</p> <p>18 see -- are you looking at that page?</p> <p>19 A. Yes.</p> <p>20 Q. Okay. On it, when you look at the bottom, it</p> <p>21 says the "Originator" of this wire transfer was</p> <p>22 "Fidelity National Title Agency Inc."; do you see that?</p> <p>23 MR. CHOUDHRI: Objection, form.</p> <p>24 MS. HOOD: Object to form.</p> <p>25 A. Yes.</p>

<p style="text-align: right;">Page 142</p> <p>1 Q. (BY MR. BALLASES:) Okay. And it says the</p> <p>2 "Beneficiary" and it lists your account number?</p> <p>3 A. Yes.</p> <p>4 MR. CHOUDHRI: Objection, form.</p> <p>5 MS. HOOD: Objection, form.</p> <p>6 Q. (BY MR. BALLASES:) Okay. And the amount is</p> <p>7 \$100,000?</p> <p>8 MR. CHOUDHRI: Objection, form.</p> <p>9 MS. HOOD: Objection, form.</p> <p>10 A. Yes.</p> <p>11 Q. (BY MR. BALLASES:) Can you tell Judge Norman</p> <p>12 why the title company -- Fidelity National Title Agency</p> <p>13 was wiring \$100,000 into your account in February of</p> <p>14 2024?</p> <p>15 MR. CHOUDHRI: Objection, form.</p> <p>16 MS. HOOD: Object to form.</p> <p>17 A. I don't know. I don't remember at all.</p> <p>18 Q. (BY MR. BALLASES:) Right. You were retired</p> <p>19 at that point?</p> <p>20 A. I don't know.</p> <p>21 MR. CHOUDHRI: Objection, form.</p> <p>22 Q. (BY MR. BALLASES:) Okay. I'm now going to</p> <p>23 hand you Exhibit 35 to your deposition. Ms. Choudhri,</p> <p>24 and these are checks that were -- I'll represent to</p> <p>25 you, these are checks that were written from this</p>	<p style="text-align: right;">Page 144</p> <p>1 Q. (BY MR. BALLASES:) Okay.</p> <p>2 MR. CHOUDHRI: Mr. Ballases, where did</p> <p>3 you obtain these bank records? Are these bank records</p> <p>4 that you obtained?</p> <p>5 Q. (BY MR. BALLASES:) So if you look --</p> <p>6 MR. CHOUDHRI: Mr. Ballases, can you</p> <p>7 identify where these records are from?</p> <p>8 MR. BALLASES: No.</p> <p>9 Q. (BY MR. BALLASES:) If you -- can you look at</p> <p>10 the check date September 20th of 2022?</p> <p>11 MS. HOOD: Object to form.</p> <p>12 A. Yes.</p> <p>13 Q. (BY MR. BALLASES:) I can help you find it.</p> <p>14 Yeah. You got it. Perfect.</p> <p>15 MR. CHOUDHRI: Mr. Ballases, --</p> <p>16 Q. (BY MR. BALLASES:) Okay.</p> <p>17 MR. CHOUDHRI: -- why are you refusing</p> <p>18 --</p> <p>19 MR. BALLASES: This is my deposition.</p> <p>20 This is not the time to discuss this. You have already</p> <p>21 gone in front of the Judge repeatedly.</p> <p>22 MR. CHOUDHRI: You have --</p> <p>23 MR. BALLASES: So --</p> <p>24 MS. HOOD: No, we haven't, but ask</p> <p>25 your questions and we'll keep objecting.</p>
<p style="text-align: right;">Page 143</p> <p>1 account to third parties. There's only a few of them</p> <p>2 I'm going to talk about.</p> <p>3 MR. BALLASES: Is this 35 or 34?</p> <p>4 MS. HOOD: I have it as 35.</p> <p>5 MR. BALLASES: Okay. Yeah, you're</p> <p>6 right.</p> <p>7 (Exhibit No. 35 marked.)</p> <p>8 Q. (BY MR. BALLASES:) Okay. Exhibit 35, you can</p> <p>9 see just looking at the first page, you can see these</p> <p>10 are checks from your account says "Mobeen N. Choudhri</p> <p>11 or Shahnaz A. Choudhri" and it's got the Account No.</p> <p>12 100686328?</p> <p>13 A. Yes.</p> <p>14 MR. CHOUDHRI: Objection, form.</p> <p>15 Q. (BY MR. BALLASES:) And it says "Frost Bank" on</p> <p>16 it?</p> <p>17 MR. CHOUDHRI: Objection, form.</p> <p>18 MS. HOOD: Object to form. You have</p> <p>19 not --</p> <p>20 Q. (BY MR. BALLASES:) Do you see that?</p> <p>21 MS. HOOD: -- produced anything that</p> <p>22 shows where this came from --</p> <p>23 MR. BALLASES: Okay.</p> <p>24 MS. HOOD: -- and I object to our</p> <p>25 assertion that is from her bank accounts.</p>	<p style="text-align: right;">Page 145</p> <p>1 MR. CHOUDHRI: Mr. Ballases, are you</p> <p>2 refusing to provide where you received these documents</p> <p>3 from?</p> <p>4 Q. (BY MR. BALLASES:) So if look on this</p> <p>5 particular check --</p> <p>6 MR. CHOUDHRI: You're going to ignore</p> <p>7 my --</p> <p>8 Q. (BY MR. BALLASES:) -- within Exhibit 35,</p> <p>9 there is a check written. It says the "Remitter" is</p> <p>10 you, "Shahnaz Choudhri," and the date is September</p> <p>11 20th, 2002. And it's "Pay to the order of: George</p> <p>12 Lee, 35 River Crest." Do you see that?</p> <p>13 A. Yes.</p> <p>14 MR. CHOUDHRI: Object to form.</p> <p>15 MS. HOOD: Objection, form.</p> <p>16 Q. (BY MR. BALLASES:) Okay. And the amount is</p> <p>17 half a million dollars. Do you see that?</p> <p>18 MR. CHOUDHRI: Objection, form.</p> <p>19 MS. HOOD: Object to form.</p> <p>20 Q. (BY MR. BALLASES:) Okay. Have you ever done</p> <p>21 any business with George Lee?</p> <p>22 MR. CHOUDHRI: Objection, form.</p> <p>23 MS. HOOD: Objection, form.</p> <p>24 A. I don't know.</p> <p>25 Q. (BY MR. BALLASES:) Okay. Do you know who</p>

<p style="text-align: right;">Page 146</p> <p>1 George Lee is?</p> <p>2 MS. HOOD: Object to form.</p> <p>3 MR. CHOUDHRI: Objection, form.</p> <p>4 A. No.</p> <p>5 Q. (BY MR. BALLASES:) Okay. So as you sit here</p> <p>6 today, do you recall making a cashier's check or</p> <p>7 instructing your bank to make a cashier's check for</p> <p>8 half a million dollars in September of 2022 to pay</p> <p>9 George Lee?</p> <p>10 A. I don't know --</p> <p>11 MS. HOOD: Object to form.</p> <p>12 MR. CHOUDHRI: Objection, form.</p> <p>13 Q. (BY MR. BALLASES:) Okay. You didn't</p> <p>14 authorize this payment, did you?</p> <p>15 MS. HOOD: Object to form.</p> <p>16 MR. CHOUDHRI: Objection, form.</p> <p>17 Let's -- let's clarify the answer.</p> <p>18 Her answer is "I don't recall." I just want to make</p> <p>19 sure that you're not misunderstanding her answer.</p> <p>20 Q. (BY MR. BALLASES:) Okay. So if we turn to</p> <p>21 the next check, which is dated February 17th, 2023 or</p> <p>22 to the check that's dated February 17th, 2023. There</p> <p>23 you go. Okay.</p> <p>24 MS. HOOD: Just -- just a minute. Are</p> <p>25 we close to getting to the end because we're at 38</p>	<p style="text-align: right;">Page 148</p> <p>1 A. Yes.</p> <p>2 Q. Okay. If you wee -- when we left we were</p> <p>3 looking at check dated February 17th of 2023. It's</p> <p>4 found within Exhibit 35 to your deposition. Do you see</p> <p>5 that check in front of you?</p> <p>6 MR. CHOUDHRI: Objection to form.</p> <p>7 MS. HOOD: Object to form.</p> <p>8 A. Yes.</p> <p>9 Q. (BY MR. BALLASES:) Okay. So this is a</p> <p>10 cashier's check and, again, it says the "Remitter" is</p> <p>11 yourself. It says "Shahnaz Akhter Choudhri"; do you</p> <p>12 see that?</p> <p>13 A. Yes.</p> <p>14 MR. CHOUDHRI: Objection, form.</p> <p>15 Q. (BY MR. BALLASES:) And it's in the amount of</p> <p>16 One million, seven hundred twenty-six dollars -- or</p> <p>17 excuse me -- \$1,726,200.14. Do you see that?</p> <p>18 A. Yes.</p> <p>19 MR. CHOUDHRI: Objection, form.</p> <p>20 Q. (BY MR. BALLASES:) Okay. And it's payable to</p> <p>21 "Marilyn Burgess, Harris County District Clerk."</p> <p>22 MR. CHOUDHRI: Objection, form.</p> <p>23 MS. HOOD: Objection, form.</p> <p>24 Q. (BY MR. BALLASES:) Do you see that?</p> <p>25 A. I don't remember.</p>
<p style="text-align: right;">Page 147</p> <p>1 minutes.</p> <p>2 MR. BALLASES: Do you want to take a</p> <p>3 break?</p> <p>4 MS. HOOD: Yes.</p> <p>5 MR. BALLASES: Okay. Let's take a</p> <p>6 break.</p> <p>7 THE VIDEOGRAPHER: Off the record at</p> <p>8 2:50.</p> <p>9 (Off the record.)</p> <p>10 THE VIDEOGRAPHER: We're back on the</p> <p>11 record at 2:56.</p> <p>12 Q. (BY MR. BALLASES:) Ms. Choudhri --</p> <p>13 MS. HOOD: Just for a minute --</p> <p>14 MR. CHOUDHRI: Sure.</p> <p>15 MS. HOOD: Can -- Ms. Mendez, can you</p> <p>16 identify who your employer is for me because I don't</p> <p>17 think that was ever stated. And I'd like to have it as</p> <p>18 attendance on the -- at the depo.</p> <p>19 MS. MENDEZ: Osama Abdullatif.</p> <p>20 MS. HOOD: Personally or for his</p> <p>21 company?</p> <p>22 MS. MENDEZ: For his company.</p> <p>23 MS. HOOD: Okay. Thank you.</p> <p>24 Q. (BY MR. BALLASES:) Ms. Choudhri, we're back</p> <p>25 from a short break. Are you ready to get started?</p>	<p style="text-align: right;">Page 149</p> <p>1 Q. Right there? Do you see that, though?</p> <p>2 A. Yes.</p> <p>3 Q. Okay.</p> <p>4 MR. CHOUDHRI: Objection form.</p> <p>5 Q. (BY MR. BALLASES:) You -- you don't have a</p> <p>6 recollection of -- well, strike that.</p> <p>7 Do you know why this check was written?</p> <p>8 MR. CHOUDHRI: Objection, form.</p> <p>9 MS. HOOD: Object to form.</p> <p>10 A. One thing I'm telling you, it's hard to --</p> <p>11 it's hard to answer the question now because I'm -- I'm</p> <p>12 not in the position to answer it because I have really</p> <p>13 bad situation right now. And that's so hard to</p> <p>14 understand it now because my memory is not working</p> <p>15 about since last month and because of this Lee.</p> <p>16 He give me the hard time. But the name is</p> <p>17 George Lee. He closed my account for three months. I</p> <p>18 was also paying a lot of money for the attorney and I</p> <p>19 couldn't use it at this Frost Bank account. That's why</p> <p>20 there's a lot of stress of these things.</p> <p>21 Q. (BY MR. BALLASES:) Okay. I appreciate --</p> <p>22 A. When I don't feel comfortable, I get tired.</p> <p>23 That's why we make some break to start it over.</p> <p>24 Q. Right. And I'm fine. Like, we've been</p> <p>25 taking breaks --</p>



<p style="text-align: right;">Page 150</p> <p>1 A. Yes. You are very cooperative. But I'm</p> <p>2 telling you to my position.</p> <p>3 Q. Yeah, I appreciate that.</p> <p>4 A. I like what you're doing --</p> <p>5 Q. Thank you.</p> <p>6 A. -- but I have to answer the question which</p> <p>7 I'm not able to do it.</p> <p>8 Q. That's okay. All you can do is -- is tell --</p> <p>9 A. Yes.</p> <p>10 Q. -- the truth and that's if it's "I don't</p> <p>11 know," I don't know.</p> <p>12 A. Yes. Are you going to -- you don't know my</p> <p>13 position. I know what I'm dealing, that's the main</p> <p>14 thing.</p> <p>15 Q. Yeah.</p> <p>16 A. That's why I'm telling you, it's too much for</p> <p>17 me.</p> <p>18 Q. Okay. Well, I'm going to push through fast.</p> <p>19 We're almost done. We have this --</p> <p>20 A. Okay. Okay.</p> <p>21 Q. -- document and that one and that one's</p> <p>22 barely --</p> <p>23 A. Thank you. Thank you for being so</p> <p>24 cooperative. Thank you.</p> <p>25 Q. Sure. If you need a break, just tell me,</p>	<p style="text-align: right;">Page 152</p> <p>1 Q. (BY MR. BALLASES:) Okay. If we turn a little</p> <p>2 bit further on, it's the same date, I believe -- yeah,</p> <p>3 right here.</p> <p>4 So there's a check, a few pages beyond what</p> <p>5 we were just looking at in Exhibit 35. It's also dated</p> <p>6 February 23rd, 2023, but this particular cashier's</p> <p>7 check is in the amount of "\$133,717.40"; do you see</p> <p>8 that?</p> <p>9 A. Yes.</p> <p>10 MR. CHOUDHRI: Objection, form.</p> <p>11 MS. HOOD: Objection, form.</p> <p>12 Q. (BY MR. BALLASES:) Okay. And the "Remitter"</p> <p>13 is -- it says "Shahnaz Choudhri"; do you see that?</p> <p>14 MR. CHOUDHRI: Objection, form.</p> <p>15 MS. HOOD: Objection, form.</p> <p>16 A. Yes.</p> <p>17 Q. (BY MR. BALLASES:) And it's "Pay to the order</p> <p>18 of Marilyn Burgess, Harris County District Clerk"; do</p> <p>19 you see that?</p> <p>20 A. Yes.</p> <p>21 MR. CHOUDHRI: Objection, form.</p> <p>22 MS. HOOD: Object to form.</p> <p>23 Q. (BY MR. BALLASES:) Okay. My question is, and</p> <p>24 I think I know the answer, but do you have a</p> <p>25 recollection of why this particular check was written</p>
<p style="text-align: right;">Page 151</p> <p>1 please, and I'm happy to oblige.</p> <p>2 A. Okay. Okay. That's fine.</p> <p>3 Q. Okay. So looking at this check that was</p> <p>4 dated February 17th of 2023 in the amount of</p> <p>5 \$1,726,200.14.</p> <p>6 A. Uh-huh.</p> <p>7 Q. It was written out, it says "Pay to the order</p> <p>8 of: Marilyn Burgess, Harris County District Court."</p> <p>9 And you at that time in February of 2023, you didn't</p> <p>10 have any business personally before the Harris County</p> <p>11 District Court, did you?</p> <p>12 MR. CHOUDHRI: Objection, form.</p> <p>13 MS. HOOD: Object to form.</p> <p>14 A. I don't know.</p> <p>15 Q. (BY MR. BALLASES:) Okay. Do you know -- do</p> <p>16 you know why this particular check was written?</p> <p>17 MR. CHOUDHRI: Objection, form.</p> <p>18 MS. HOOD: Object to form.</p> <p>19 A. No, I don't remember at all.</p> <p>20 Q. (BY MR. BALLASES:) Okay. Did you -- do you</p> <p>21 recall instructing your bank to make this cashier's</p> <p>22 check?</p> <p>23 MS. HOOD: Objection, form.</p> <p>24 MR. CHOUDHRI: Objection, form.</p> <p>25 A. I don't know.</p>	<p style="text-align: right;">Page 153</p> <p>1 from your account to the Harris County District Clerk?</p> <p>2 MR. CHOUDHRI: Objection, form.</p> <p>3 MS. HOOD: Object to form.</p> <p>4 A. No. I don't remember.</p> <p>5 Q. (BY MR. BALLASES:) Okay. Do you have a</p> <p>6 recollection of instructing your bank, Frost Bank, in</p> <p>7 February of '23 to prepare this particular cashier's</p> <p>8 check?</p> <p>9 MR. CHOUDHRI: Objection, form.</p> <p>10 MS. HOOD: Objection, form.</p> <p>11 A. I don't know.</p> <p>12 Q. (BY MR. BALLASES:) Okay. Staying in Exhibit</p> <p>13 35, and turning a few payments beyond, there's another</p> <p>14 check, another cashier's check, that was written on the</p> <p>15 same date, February 23rd, 2023, but it was in the</p> <p>16 amount of \$200,000. Do you see that?</p> <p>17 A. Yes.</p> <p>18 MR. CHOUDHRI: Objection, form.</p> <p>19 MS. HOOD: Object to form.</p> <p>20 Q. (BY MR. BALLASES:) Okay. And this one, the</p> <p>21 "Remitter" again, is yourself, it's "Shahnaz Choudhri";</p> <p>22 do you see that?</p> <p>23 MR. CHOUDHRI: Objection, form.</p> <p>24 MS. HOOD: Objection, form.</p> <p>25 A. Yes.</p>

<p style="text-align: right;">Page 154</p> <p>1 Q. (BY MR. BALLASES:) And this time it says "Pay</p> <p>2 to the order of: Jetall Company"; do you see that?</p> <p>3 MS. HOOD: Objection, form.</p> <p>4 MR. CHOUDHRI: Objection, form.</p> <p>5 Q. (BY MR. BALLASES:) Okay. Can you tell Judge</p> <p>6 Norman why in February of '23 you wrote a -- or there</p> <p>7 was a cashier's check from your account to Jetall</p> <p>8 Company in the amount of \$200,000?</p> <p>9 MR. CHOUDHRI: Objection, form.</p> <p>10 MS. HOOD: Objection, form.</p> <p>11 A. I don't know.</p> <p>12 Q. (BY MR. BALLASES:) Okay. Did you instruct</p> <p>13 your bank to create this cashier's check in the amount</p> <p>14 of \$200,000 or do you recall?</p> <p>15 MS. HOOD: Object to form.</p> <p>16 MR. CHOUDHRI: Objection, form.</p> <p>17 A. No.</p> <p>18 Q. (BY MR. BALLASES:) Okay.</p> <p>19 MS. HOOD: No, you don't or no, you</p> <p>20 don't recall?</p> <p>21 A. I don't recall.</p> <p>22 Q. (BY MR. BALLASES:) Stay on Exhibit 35, but we</p> <p>23 turn to the check that has a date of February 2nd,</p> <p>24 2024.</p> <p>25 Okay. So looking at check -- the check dated</p>	<p style="text-align: right;">Page 156</p> <p>1 that page.</p> <p>2 A. Yeah.</p> <p>3 Q. It has your signature at the top; is that</p> <p>4 right?</p> <p>5 MS. HOOD: Objection, form.</p> <p>6 MR. CHOUDHRI: Object to form.</p> <p>7 A. This one?</p> <p>8 Q. (BY MR. BALLASES:) Yeah. Right there. Is</p> <p>9 that your signature?</p> <p>10 MR. CHOUDHRI: Objection, form.</p> <p>11 MS. HOOD: Object to form.</p> <p>12 A. I don't know.</p> <p>13 Q. (BY MR. BALLASES:) Okay. And it says -- it</p> <p>14 lists an account and it says "Paid to 50BH Acquisition,</p> <p>15 LLC"; do you see that?</p> <p>16 MR. CHOUDHRI: Objection, form.</p> <p>17 A. Yes.</p> <p>18 Q. (BY MR. BALLASES:) Okay. Do you have any</p> <p>19 recollection of what 50BH Acquisition, LLC, is?</p> <p>20 MR. CHOUDHRI: Objection, form.</p> <p>21 MS. HOOD: Object to form.</p> <p>22 A. I don't know.</p> <p>23 Q. (BY MR. BALLASES:) You've never done business</p> <p>24 with that company, have you?</p> <p>25 A. I don't know.</p>
<p style="text-align: right;">Page 155</p> <p>1 February 2nd, 2024 in Exhibit 35 in the amount of half</p> <p>2 a million dollars. Do you see that?</p> <p>3 MS. HOOD: Objection, form.</p> <p>4 MR. CHOUDHRI: Object to form.</p> <p>5 Q. (BY MR. BALLASES:) Okay. This check, it says</p> <p>6 the "Remitter" it says is -- here it says "Mobeen Naeem</p> <p>7 Choudhri or Shahnaz Akhter Choudhri"; do you see that?</p> <p>8 MR. CHOUDHRI: Objection, form.</p> <p>9 MS. HOOD: Object to form.</p> <p>10 A. Yes.</p> <p>11 Q. (BY MR. BALLASES:) Okay. And it says "Pay to</p> <p>12 the order of" and it lists yourself and Mobeen again.</p> <p>13 It says "Pay to the order of: Mobeen Choudhri or</p> <p>14 Shahnaz Akhter Choudhri"; do you see that?</p> <p>15 MR. CHOUDHRI: Objection, form.</p> <p>16 MS. HOOD: Objection, form.</p> <p>17 A. I don't remember.</p> <p>18 Q. (BY MR. BALLASES:) Okay. But what I -- so</p> <p>19 you -- as you sit here today, you have no recollection</p> <p>20 of why this particular check was created?</p> <p>21 A. Yes. I don't know.</p> <p>22 MR. CHOUDHRI: Objection, form.</p> <p>23 MS. HOOD: Objection, form.</p> <p>24 Q. (BY MR. BALLASES:) Okay. If you look at the</p> <p>25 reverse side of the check, which is the second image on</p>	<p style="text-align: right;">Page 157</p> <p>1 MR. CHOUDHRI: Objection, form.</p> <p>2 Q. (BY MR. BALLASES:) Okay. You're not -- you</p> <p>3 don't have any interest in 50BH Acquisition, LLC, do</p> <p>4 you?</p> <p>5 A. I don't know.</p> <p>6 MR. CHOUDHRI: Objection, form.</p> <p>7 MS. HOOD: Object to form.</p> <p>8 A. I don't know.</p> <p>9 Q. (BY MR. BALLASES:) Okay. Do you have a</p> <p>10 recollection of ever -- well, strike that.</p> <p>11 I'm now handing you Exhibit 36 to your</p> <p>12 deposition.</p> <p>13 (Exhibit No. 36 marked.)</p> <p>14 Q. (BY MR. BALLASES:) Okay. Exhibit 36, I will</p> <p>15 tell you -- you know, we're going to stay on this,</p> <p>16 but -- okay.</p> <p>17 Exhibit 36 is a document titled "Certificate</p> <p>18 of Formation." Do you see that at the top?</p> <p>19 A. Yeah.</p> <p>20 MR. CHOUDHRI: Objection, form.</p> <p>21 Q. (BY MR. BALLASES:) And then it says that the</p> <p>22 "Entity" is "50BH Acquisition, LLC"; do you see that?</p> <p>23 A. Yes.</p> <p>24 MR. CHOUDHRI: Objection, form.</p> <p>25 MS. HOOD: Object to form.</p>

<p style="text-align: right;">Page 158</p> <p>1 Q. (BY MR. BALLASES:) Okay. And if you look at</p> <p>2 the top right, it says this was filed in June of 2023.</p> <p>3 Do you see that?</p> <p>4 A. Yes.</p> <p>5 MR. CHOUDHRI: Objection, form.</p> <p>6 Q. (BY MR. BALLASES:) Okay. You were retired at</p> <p>7 that point --</p> <p>8 A. I don't know.</p> <p>9 MR. CHOUDHRI: -- objection, form.</p> <p>10 Q. (BY MR. BALLASES:) Okay. And it says the</p> <p>11 "Manager" is "Shahnaz Choudhri"; do you see that?</p> <p>12 MR. CHOUDHRI: Objection, form.</p> <p>13 Q. (BY MR. BALLASES:) At the bottom?</p> <p>14 A. Yes.</p> <p>15 Q. Do you have any recollection of ever creating</p> <p>16 a company called 50BH Acquisition, LLC?</p> <p>17 A. I don't remember.</p> <p>18 MR. CHOUDHRI: Objection, form.</p> <p>19 MS. HOOD: Object to form.</p> <p>20 Q. (BY MR. BALLASES:) Did you ever authorize</p> <p>21 anybody to create this company and list yourself as a</p> <p>22 manager?</p> <p>23 A. I don't know.</p> <p>24 MR. CHOUDHRI: Objection, form.</p> <p>25 MS. HOOD: Object to form.</p>	<p style="text-align: right;">Page 160</p> <p>1 MS. HOOD: Objection, form.</p> <p>2 Q. (BY MR. BALLASES:) This is now the second</p> <p>3 check we've seen for half a million dollars written on</p> <p>4 this date from yourself to yourself.</p> <p>5 MS. HOOD: Objection, form.</p> <p>6 MR. CHOUDHRI: Objection, form.</p> <p>7 Q. (BY MR. BALLASES:) Do you recall that?</p> <p>8 A. Yes.</p> <p>9 Q. Okay. And so as you sit here today, it shows</p> <p>10 -- well, strike that.</p> <p>11 As you look at it, it shows the "Remitter" is</p> <p>12 "Mobeen Naeem Choudhri or Shahnaz Akhter Choudhri"; do</p> <p>13 you see that?</p> <p>14 MR. CHOUDHRI: Objection, form.</p> <p>15 MS. HOOD: Object to form.</p> <p>16 A. Yes.</p> <p>17 Q. (BY MR. BALLASES:) Okay. And the "Payee,"</p> <p>18 pay to the order of, is either "Mobeen Naeem Choudhri</p> <p>19 or Shahnaz Akhter Choudhri"; do you see that?</p> <p>20 A. Yes.</p> <p>21 MR. CHOUDHRI: Objection, form.</p> <p>22 MS. HOOD: Object to form.</p> <p>23 Q. (BY MR. BALLASES:) Okay. Do you have</p> <p>24 recollection of instructing your bank to make this</p> <p>25 cashier's check in February of 2024 for half a million</p>
<p style="text-align: right;">Page 159</p> <p>1 Q. (BY MR. BALLASES:) Okay. I'm going to point</p> <p>2 you, still on Exhibit 35, I'm going to point you to</p> <p>3 another check that was dated February 2nd of 2024.</p> <p>4 Okay. So we're still on Exhibit 35, we're</p> <p>5 now looking at another check that was written in</p> <p>6 February --</p> <p>7 A. This is the same check you show me before?</p> <p>8 MR. CHOUDHRI: Objection, form.</p> <p>9 Q. (BY MR. BALLASES:) No. It's actually not.</p> <p>10 If you look at the check number, I was going to</p> <p>11 specify the check number this time because it is</p> <p>12 different.</p> <p>13 So if you look, there are several</p> <p>14 half-a-million-dollar checks made the same date, so</p> <p>15 here's 833, there's 834.</p> <p>16 A. Okay. That's fine.</p> <p>17 Q. Okay.</p> <p>18 A. I don't remember at all.</p> <p>19 Q. That's okay. Okay.</p> <p>20 A. Okay.</p> <p>21 Q. So looking at the February 2nd, 2024 check,</p> <p>22 which is Check No. 569008834, it's in the amount of</p> <p>23 \$500,000. Do you see that?</p> <p>24 A. Yes.</p> <p>25 MR. CHOUDHRI: Objection, form.</p>	<p style="text-align: right;">Page 161</p> <p>1 dollars?</p> <p>2 MS. HOOD: Object to form.</p> <p>3 MR. CHOUDHRI: Objection, form.</p> <p>4 A. Yes.</p> <p>5 Q. (BY MR. BALLASES:) You do have a</p> <p>6 recollection?</p> <p>7 A. No.</p> <p>8 Q. So do you recall telling the bank --</p> <p>9 MR. CHOUDHRI: Objection, form.</p> <p>10 Q. (BY MR. BALLASES:) -- to make this check?</p> <p>11 A. No.</p> <p>12 MR. CHOUDHRI: Objection, form.</p> <p>13 MS. HOOD: Object to form.</p> <p>14 A. I think I have a problem with the banker with</p> <p>15 --</p> <p>16 MR. CHOUDHRI: Objection, form.</p> <p>17 A. -- George Lee.</p> <p>18 Q. (BY MR. BALLASES:) Okay.</p> <p>19 A. He's giving me too much confusion. He give</p> <p>20 me a hard time. I don't -- on that time, there was</p> <p>21 something going wrong.</p> <p>22 Q. Okay.</p> <p>23 A. I don't know what's going on. I don't</p> <p>24 remember.</p> <p>25 Q. That's okay. If we look here on this check</p>

<p style="text-align: right;">Page 162</p> <p>1 also at the reverse side of the check on the bottom 2 image, it says -- it's got your signature on it. Do 3 you see that? 4 A. Yes. 5 Q. Okay. And then it says paid to "50BH 6 Acquisition, LLC"; do you see that? 7 MR. CHOUDHRI: Objection, form. 8 A. Yes. 9 Q. (BY MR. BALLASES:) Okay. Can you tell the 10 Court why this 50 -- this half a million dollars was 11 paid to BH Acquisition, LLC? 12 MR. CHOUDHRI: Objection, form. 13 MS. HOOD: Objection, form. 14 A. I don't know. 15 Q. (BY MR. BALLASES:) Okay. Let me see how to 16 best do this. Okay. I'm going to ask you to -- I've 17 done a poor job making this clear so I want to clear 18 this up. 19 So one of the first -- one of the earlier 20 check we looked at today was one of the 21 half-million-dollar checks written on February 2nd of 22 2024 from yourself to yourself and it has the "Pay to: 23 50BH Acquisition"; do you see that? 24 A. Yes. 25 MS. HOOD: Object to form.</p>	<p style="text-align: right;">Page 164</p> <p>1 569008833. Do you see that? 2 A. Yes. 3 MR. CHOUDHRI: Objection, form. 4 MS. HOOD: Object to form. 5 Q. (BY MR. BALLASES:) Okay. So that's a third 6 check that we've looked at in the same amount on the 7 same date. And then the final check in that amount 8 that we see, that we just spoke about, is also dated, 9 same date, February 2nd, 2024, same amount, half a 10 million dollars. The "Remitter" is yourself from your 11 account, "Payee" is yourself and it says "Paid to 50BH 12 Acquisitions, LLC." 13 MR. CHOUDHRI: Objection, form. 14 MS. HOOD: Objection, form. 15 I'm also going to object to the sidebar 16 commentary and testimony about what the checks are. 17 Q. (BY MR. BALLASES:) Okay. And so this check 18 number is 569008834. Do you see that? 19 A. Yes. 20 MR. CHOUDHRI: Objection, form. 21 MS. HOOD: Objection, form. 22 Q. (BY MR. BALLASES:) Okay. So that's four 23 checks each in the amount of half a million dollars to 24 BH Acquisitions, LLC, written on the same date, 25 February 2nd of 2024. Do you have a recollection of</p>
<p style="text-align: right;">Page 163</p> <p>1 MR. CHOUDHRI: Objection, form. 2 Q. (BY MR. BALLASES:) The first check I see has 3 the Check No. 569008832; do you see that? 4 A. Yes. 5 MS. HOOD: Object to form. 6 MR. CHOUDHRI: Objection, form. 7 Q. (BY MR. BALLASES:) Okay. Then we flip a 8 little bit further, we see a second -- in that same 9 exhibit, Exhibit 35, we see a second check, same date, 10 same amount, same remitter, same payee, half a million 11 dollars, but this one is -- and it's paid to BH 50 12 Acquisition, LLC, but this one is Check No. 569008835. 13 Do you see that? 14 A. Yes. 15 MR. CHOUDHRI: Objection, form. 16 MS. HOOD: Objection, form. 17 Q. (BY MR. BALLASES:) Okay. So that's a second 18 one. And then if we flip a few pages further, we see 19 another half-million-dollar check, same date, February 20 2nd, 2024. The "Remitter" is yourself, this account, 21 and you're paying to yourself and it says "Paid to: 22 50BH Acquisitions, LLC"; do you see that? 23 MR. CHOUDHRI: Objection, form. 24 MS. HOOD: Object to form. 25 Q. (BY MR. BALLASES:) But this one is Check No.</p>	<p style="text-align: right;">Page 165</p> <p>1 why those checks were written? 2 MR. CHOUDHRI: Objection, form. 3 MS. HOOD: Object to form. 4 A. I don't know. 5 Q. (BY MR. BALLASES:) Okay. Bear with me. 6 Okay. Sorry about that. 7 Still looking at Exhibit 35 to your 8 deposition, there's another check that is Check No. 9 569008836. 10 MR. CHOUDHRI: Objection, form. 11 Q. (BY MR. BALLASES:) It's dated February 2nd of 12 2024, it's in the amount of 300,000. Do you see that? 13 A. Yes. 14 MR. CHOUDHRI: Objection, form. 15 Q. (BY MR. BALLASES:) Okay. And the "Remitter" 16 is from your account. It says "Mobeen Naeem Choudhri 17 or Shahnaz Akhter Choudhri"; do you see that? 18 A. Yes. 19 MS. HOOD: Objection, form. 20 MR. CHOUDHRI: Objection, form. 21 Q. (BY MR. BALLASES:) "Payee" is the same 22 people. It's "Mobeen Naeem Choudhri or Shahnaz Akhter 23 Choudhri." Do you see that? 24 A. Yes. 25 MR. CHOUDHRI: Objection, form.</p>

<p style="text-align: right;">Page 166</p> <p>1 MS. HOOD: Objection, form.</p> <p>2 Q. (BY MR. BALLASES:) And if you look at the</p> <p>3 back of the check, which is the image below, on that</p> <p>4 same page, it's got your signature?</p> <p>5 A. Yes.</p> <p>6 MR. CHOUDHRI: Objection, form.</p> <p>7 MS. HOOD: Object to form.</p> <p>8 Q. (BY MR. BALLASES:) Okay. And this one also</p> <p>9 says "Paid to: 50BH Acquisitions, LLC"; do you see</p> <p>10 that?</p> <p>11 MR. CHOUDHRI: Objection, form.</p> <p>12 MS. HOOD: Object to form.</p> <p>13 A. Yes. I don't know.</p> <p>14 Q. (BY MR. BALLASES:) Okay. This one's but</p> <p>15 300,000 so it's less. And so do you have any</p> <p>16 recollection as to why you're pulling this money out of</p> <p>17 your account in February of 2024 to pay BH</p> <p>18 Acquisitions, LLC?</p> <p>19 MR. CHOUDHRI: Objection, form.</p> <p>20 MS. HOOD: Objection, form.</p> <p>21 A. I don't know. I don't remember.</p> <p>22 Q. (BY MR. BALLASES:) Do you have a</p> <p>23 recollection -- do you remember instructing your bank</p> <p>24 to make this cashier's check?</p> <p>25 A. I don't.</p>	<p style="text-align: right;">Page 168</p> <p>1 people. It's either "Mobeen Naeem Choudhri or Shahnaz</p> <p>2 Akhter Choudhri"; do you see that?</p> <p>3 MR. CHOUDHRI: Objection, form.</p> <p>4 A. Yes.</p> <p>5 Q. (BY MR. BALLASES:) Okay. And if look at the</p> <p>6 back side of the check, the image beneath it, it shows</p> <p>7 it's signed by you; is that right?</p> <p>8 A. Yes.</p> <p>9 MR. CHOUDHRI: Objection, form.</p> <p>10 MS. HOOD: Object to form.</p> <p>11 Q. (BY MR. BALLASES:) But I know you don't</p> <p>12 remember signing it, but do you recall if that's your</p> <p>13 -- or can you see that that's your signature?</p> <p>14 A. I don't remember.</p> <p>15 MR. CHOUDHRI: Objection, form.</p> <p>16 MS. HOOD: Object to form.</p> <p>17 Q. (BY MR. BALLASES:) Okay. And, see, it says</p> <p>18 "Paid to: 50BH Acquisitions, LLC"?</p> <p>19 A. No.</p> <p>20 MR. CHOUDHRI: Objection, form.</p> <p>21 Q. (BY MR. BALLASES:) Do you see that right</p> <p>22 there? It says "Paid to: 50" --</p> <p>23 A. I don't remember.</p> <p>24 MS. HOOD: Objection, form.</p> <p>25 MR. CHOUDHRI: Objection, form.</p>
<p style="text-align: right;">Page 167</p> <p>1 MR. CHOUDHRI: Objection, form.</p> <p>2 MS. HOOD: Objection, form. Asked and</p> <p>3 answered.</p> <p>4 Q. (BY MR. BALLASES:) Okay. And then if we</p> <p>5 turn, staying within Exhibit 35, if we turn to Check</p> <p>6 No. 569008837. Do you see that?</p> <p>7 A. Yes.</p> <p>8 Q. Okay. This is the another check dated</p> <p>9 February 2nd of 2024.</p> <p>10 MR. CHOUDHRI: Objection, form.</p> <p>11 MS. HOOD: Object to form.</p> <p>12 Q. (BY MR. BALLASES:) Do you see it?</p> <p>13 A. Yes.</p> <p>14 MR. CHOUDHRI: Objection, form.</p> <p>15 Q. (BY MR. BALLASES:) Okay. It's in the amount</p> <p>16 of \$200,000?</p> <p>17 MR. CHOUDHRI: Objection, form.</p> <p>18 MS. HOOD: Object to form.</p> <p>19 Q. (BY MR. BALLASES:) Okay. And, again, the</p> <p>20 "Remitter" so this account, so it's yourself or Mobeen</p> <p>21 Naeem Choudhri. Do you see that?</p> <p>22 MR. CHOUDHRI: Objection, form.</p> <p>23 MS. HOOD: Objection, form.</p> <p>24 A. Yes.</p> <p>25 Q. (BY MR. BALLASES:) Okay. "Payee" is the same</p>	<p style="text-align: right;">Page 169</p> <p>1 Q. (BY MR. BALLASES:) I know you don't remember.</p> <p>2 But I'm asking if you see -- do you see here, it says</p> <p>3 "50BH Acquisitions, LLC"?</p> <p>4 A. Yes.</p> <p>5 MR. CHOUDHRI: Objection, form.</p> <p>6 MS. HOOD: Object to form.</p> <p>7 Q. (BY MR. BALLASES:) So this is another</p> <p>8 \$200,000 paid to that particular business on the same</p> <p>9 date, February 2nd, 2024.</p> <p>10 MR. CHOUDHRI: Objection, form.</p> <p>11 A. Yes.</p> <p>12 Q. (BY MR. BALLASES:) Can you tell the Judge why</p> <p>13 all of these checks are being written on the same date</p> <p>14 for, I think it's 2.5 million now?</p> <p>15 MS. HOOD: Object to form.</p> <p>16 MR. CHOUDHRI: Objection, form.</p> <p>17 A. Yes. I can't -- don't recognize these</p> <p>18 things.</p> <p>19 Q. (BY MR. BALLASES:) Okay. Can you even -- do</p> <p>20 you know if you instructed the bank to prepare that</p> <p>21 check?</p> <p>22 A. I don't know.</p> <p>23 MR. CHOUDHRI: Objection, form.</p> <p>24 MS. HOOD: Object to form.</p> <p>25 Q. (BY MR. BALLASES:) Okay. If we stay on this</p>

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<p style="text-align: right;">Page 170</p> <p>1 exhibit, but we turn to Check No. -- I was on it.</p> <p>2 So if we stay on Exhibit 35, but we turn to</p> <p>3 Check No. 569008838. Do you see that page?</p> <p>4 MR. CHOUDHRI: Objection, form.</p> <p>5 A. Yes.</p> <p>6 MS. HOOD: Object to form.</p> <p>7 Q. (BY MR. BALLASES:) Okay. This is another</p> <p>8 check that's dated February 2nd, 2024. Do you see</p> <p>9 that?</p> <p>10 A. Yes.</p> <p>11 MR. CHOUDHRI: Objection, form.</p> <p>12 MS. HOOD: Objection, form.</p> <p>13 Q. (BY MR. BALLASES:) Okay. And the date is --</p> <p>14 or excuse me. The amount is \$200,000?</p> <p>15 MR. CHOUDHRI: Objection, form.</p> <p>16 A. Yes.</p> <p>17 Q. (BY MR. BALLASES:) Do you see that?</p> <p>18 MR. CHOUDHRI: Objection, form.</p> <p>19 A. Yes.</p> <p>20 Q. (BY MR. BALLASES:) And "Remitter" is, again,</p> <p>21 it's this account. So it's "Mobeen Naeem Choudhri or</p> <p>22 Shahnaz Akhter Choudhri"; do you see that?</p> <p>23 MR. CHOUDHRI: Objection, form.</p> <p>24 A. There's an objection so I don't want to</p> <p>25 answer it.</p>	<p style="text-align: right;">Page 172</p> <p>1 Q. (BY MR. BALLASES:) Okay. And it says "Pay</p> <p>2 to: 50" -- "Pay to: 50BH" --</p> <p>3 MR. CHOUDHRI: Objection, form.</p> <p>4 Q. (BY MR. BALLASES:) -- "Acquisitions, LLC"?</p> <p>5 A. Yes.</p> <p>6 MR. CHOUDHRI: Objection, form.</p> <p>7 Q. (BY MR. BALLASES:) Okay. So this is another</p> <p>8 200,000 paid on that same date to this particular</p> <p>9 entity. Do you see that?</p> <p>10 MR. CHOUDHRI: Objection, form.</p> <p>11 A. Yes.</p> <p>12 MS. HOOD: Object to form.</p> <p>13 Q. (BY MR. BALLASES:) Can you tell the Judge why</p> <p>14 all these checks are being written on the same date</p> <p>15 in -- some in differing amounts, some in the same</p> <p>16 amounts to be paid to 50BH Acquisition, LLC?</p> <p>17 MR. CHOUDHRI: Objection, form.</p> <p>18 MS. HOOD: Object to form.</p> <p>19 A. Yes. I don't want to -- I don't know. I</p> <p>20 don't know anything about it.</p> <p>21 Q. (BY MR. BALLASES:) Okay. And that's because</p> <p>22 you've never done any work with --</p> <p>23 A. Okay.</p> <p>24 MR. CHOUDHRI: Objection, form.</p> <p>25 Q. (BY MR. BALLASES:) -- 50BH Acquisitions; is</p>
<p style="text-align: right;">Page 171</p> <p>1 Q. (BY MR. BALLASES:) I know. They can object</p> <p>2 to the form which means they don't like my question,</p> <p>3 but you still have to answer it.</p> <p>4 MR. CHOUDHRI: Objection, form.</p> <p>5 MS. HOOD: Thanks to the Judge, but go</p> <p>6 ahead.</p> <p>7 Q. (BY MR. BALLASES:) So you see the "Remitter"</p> <p>8 of the check is either "Shahnaz Akhter Choudhri or</p> <p>9 Mobeen Naeem Choudhri." It's from your Frost account.</p> <p>10 MR. CHOUDHRI: Objection, form.</p> <p>11 MS. HOOD: Objection, form.</p> <p>12 Q. (BY MR. BALLASES:) Okay.</p> <p>13 MS. HOOD: And objection to the</p> <p>14 statement that it's from her Frost account.</p> <p>15 Q. (BY MR. BALLASES:) Okay. And you see it says</p> <p>16 "Pay to the order of: Mobeen Naeem Choudhri or Shahnaz</p> <p>17 Akhter Choudhri"?</p> <p>18 MR. CHOUDHRI: Objection, form.</p> <p>19 MS. HOOD: Object to form.</p> <p>20 A. Yes.</p> <p>21 Q. (BY MR. BALLASES:) Okay. And if you look at</p> <p>22 the reverse side of the check, again, it has your</p> <p>23 signature?</p> <p>24 MS. HOOD: Object to form.</p> <p>25 MR. CHOUDHRI: Objection, form.</p>	<p style="text-align: right;">Page 173</p> <p>1 that right?</p> <p>2 A. Okay. I don't know.</p> <p>3 MS. HOOD: Object to form.</p> <p>4 A. No. No.</p> <p>5 MS. HOOD: It's because she doesn't</p> <p>6 remember.</p> <p>7 MR. BALLASES: Okay.</p> <p>8 MS. HOOD: How many times does she</p> <p>9 have to tell you?</p> <p>10 MR. BALLASES: Objection, sidebar.</p> <p>11 Q. (BY MR. BALLASES:) Okay. So if we turn to</p> <p>12 exhibit -- staying on Exhibit 35, but turning to Check</p> <p>13 No. 569008839. Do you see that check?</p> <p>14 A. Yes.</p> <p>15 MR. CHOUDHRI: Objection, form.</p> <p>16 MS. HOOD: Objection, form.</p> <p>17 Q. (BY MR. BALLASES:) Okay. This is another</p> <p>18 check also written on February 2nd of 2024. Do you see</p> <p>19 that?</p> <p>20 A. Yes.</p> <p>21 MS. HOOD: Object to form.</p> <p>22 Q. (BY MR. BALLASES:) Okay. And this one is</p> <p>23 written in the amount of \$200,000. Do you see that?</p> <p>24 A. Yes.</p> <p>25 MS. HOOD: Object to form.</p>



<p style="text-align: right;">Page 174</p> <p>1 Q. (BY MR. BALLASES:) Okay. Again, the</p> <p>2 "Remitter" is yourself or Mobeen Naeem Choudhri. Do</p> <p>3 you see that?</p> <p>4 A. Yes.</p> <p>5 MS. HOOD: Object to form.</p> <p>6 Q. (BY MR. BALLASES:) Okay. And the pay is --</p> <p>7 "Pay to the order of," it's yourself Shahnaz Akhter</p> <p>8 Choudhri or Mobeen Naeem Choudhri. Do you see that?</p> <p>9 MR. CHOUDHRI: Objection, form.</p> <p>10 MS. HOOD: Objection, form.</p> <p>11 A. I don't know about anything.</p> <p>12 Q. (BY MR. BALLASES:) Okay. And if you look on</p> <p>13 the reverse side of it, it was signed by you, correct?</p> <p>14 MS. HOOD: Object to form.</p> <p>15 Q. (BY MR. BALLASES:) Is that right?</p> <p>16 A. I don't know.</p> <p>17 MR. CHOUDHRI: Objection, form.</p> <p>18 Q. (BY MR. BALLASES:) Do you recognize your</p> <p>19 signature at the bottom --</p> <p>20 A. I'm not sure.</p> <p>21 MR. CHOUDHRI: Objection, form.</p> <p>22 MS. HOOD: Object to form.</p> <p>23 A. I don't recognize anything.</p> <p>24 Q. (BY MR. BALLASES:) You don't recognize your</p> <p>25 signature?</p>	<p style="text-align: right;">Page 176</p> <p>1 remember or you don't know?</p> <p>2 THE WITNESS: I don't remember.</p> <p>3 MR. BALLASES: Objection to sidebar.</p> <p>4 THE WITNESS: That's the same thing.</p> <p>5 I don't know.</p> <p>6 MS. HOOD: Thank you.</p> <p>7 THE WITNESS: I don't know --</p> <p>8 MS. HOOD: That's not a sidebar.</p> <p>9 THE WITNESS: That's for the same</p> <p>10 thing.</p> <p>11 MS. HOOD: I'm allowed to clarify her</p> <p>12 testimony.</p> <p>13 Q. (BY MR. BALLASES:) Okay. I'm now going to</p> <p>14 hand you Exhibit 37 to your deposition.</p> <p>15 (Exhibit No. 37 marked.)</p> <p>16 Q. (BY MR. BALLASES:) Here you go. I'll put</p> <p>17 this right there. Exhibit 37.</p> <p>18 Okay. So Exhibit 37 to your deposition are</p> <p>19 deposit slips from your Frost Bank account. Do you see</p> <p>20 that?</p> <p>21 A. Yes.</p> <p>22 MS. HOOD: Object to form. Object to</p> <p>23 the statement that and the testimony that it's from her</p> <p>24 Frost Bank account. There's been no, absolutely no --</p> <p>25 MR. BALLASES: Okay. You stated your</p>
<p style="text-align: right;">Page 175</p> <p>1 A. I don't.</p> <p>2 MR. CHOUDHRI: Objection, form.</p> <p>3 MS. HOOD: Object to form.</p> <p>4 Q. (BY MR. BALLASES:) And then do you see</p> <p>5 beneath that, it says "Paid to: 50BH Acquisitions,</p> <p>6 LLC"?</p> <p>7 MR. CHOUDHRI: Objection, form.</p> <p>8 MS. HOOD: Same objection.</p> <p>9 A. Okay. I don't know.</p> <p>10 Q. (BY MR. BALLASES:) Okay. But do you see it</p> <p>11 says that?</p> <p>12 A. Yes.</p> <p>13 Q. Okay.</p> <p>14 MR. CHOUDHRI: Objection, form.</p> <p>15 MS. HOOD: Objection, form.</p> <p>16 Q. (BY MR. BALLASES:) My question is again, do</p> <p>17 you have any recollection of why all these checks are</p> <p>18 being written on the same day in differing amounts to</p> <p>19 yourself and then being paid to some other company?</p> <p>20 MS. HOOD: Objection, form.</p> <p>21 MR. CHOUDHRI: Objection, form.</p> <p>22 A. No. I don't want to know. I don't know</p> <p>23 about anything.</p> <p>24 Q. (BY MR. BALLASES:) Okay.</p> <p>25 MS. HOOD: Is that because you don't</p>	<p style="text-align: right;">Page 177</p> <p>1 objection.</p> <p>2 MS. HOOD: -- foundation --</p> <p>3 MR. BALLASES: You don't need to give</p> <p>4 sidebar.</p> <p>5 MS. HOOD: -- to this document.</p> <p>6 MR. BALLASES: Okay.</p> <p>7 MS. HOOD: Yes, I do. Because you</p> <p>8 keep doing it. So stop doing it.</p> <p>9 MR. BALLASES: Okay. Do you know how</p> <p>10 the Rules work? I mean, do you want to get your client</p> <p>11 sanctioned again?</p> <p>12 MS. HOOD: I do know how the Rules</p> <p>13 work.</p> <p>14 MR. BALLASES: I hope you paid her</p> <p>15 sanctions before --</p> <p>16 MS. HOOD: I also know --</p> <p>17 MR. BALLASES: -- because she</p> <p>18 shouldn't have.</p> <p>19 MS. HOOD: I also -- I object to the</p> <p>20 sidebar there.</p> <p>21 MR. BALLASES: Okay.</p> <p>22 MS. HOOD: -- I also note that in your</p> <p>23 question is a representation that's not correct.</p> <p>24 MR. BALLASES: All right.</p> <p>25 (Parties continue speaking simultaneously.)</p>

<p style="text-align: right;">Page 178</p> <p>1 Q. (BY MR. BALLASES:) Okay. So looking at</p> <p>2 Exhibit 37, if you turn to -- if you turn to the</p> <p>3 deposit slip that is 68094, which I will pull for you.</p> <p>4 Okay. So within Exhibit 37 there's a deposit</p> <p>5 slip marked 68094. Do you see that --</p> <p>6 MR. CHOUDHRI: Objection, form.</p> <p>7 MS. HOOD: -- objection, form.</p> <p>8 A. Yes.</p> <p>9 Q. (BY MR. BALLASES:) -- okay. Do you see it?</p> <p>10 MR. CHOUDHRI: Objection, form.</p> <p>11 MS. HOOD: Object to form.</p> <p>12 A. Yes.</p> <p>13 Q. (BY MR. BALLASES:) Okay. And this is -- it</p> <p>14 looks like a check to the -- from -- excuse me --</p> <p>15 "Transact Title Galleria." Do you see that at the top</p> <p>16 left?</p> <p>17 MS. HOOD: Objection, form.</p> <p>18 MR. CHOUDHRI: Objection, form.</p> <p>19 A. Yes.</p> <p>20 Q. (BY MR. BALLASES:) Okay. And it says "Paid</p> <p>21 to: Ali Choudhri." Do you see that?</p> <p>22 A. Yes.</p> <p>23 MS. HOOD: Objection, form.</p> <p>24 MR. CHOUDHRI: Objection, form.</p> <p>25 Q. (BY MR. BALLASES:) Okay. And it's in the</p>	<p style="text-align: right;">Page 180</p> <p>1 MR. CHOUDHRI: Objection, form.</p> <p>2 A. I don't know.</p> <p>3 MS. HOOD: Also asked her a legal</p> <p>4 conclusion.</p> <p>5 Q. (BY MR. BALLASES:) Okay.</p> <p>6 A. I know my son. He's not doing that wrong,</p> <p>7 anything.</p> <p>8 Q. If you turn to -- let's see, deposit slip</p> <p>9 that's dated March 15th of 2024. Here we go.</p> <p>10 So Exhibit 37, looking at the deposit slip</p> <p>11 that's dated March 15th, 2024. Do you see that?</p> <p>12 A. Yes.</p> <p>13 MR. CHOUDHRI: Objection, form.</p> <p>14 MS. HOOD: Object to form.</p> <p>15 Q. (BY MR. BALLASES:) Okay. This shows that it</p> <p>16 says the -- well, strike that.</p> <p>17 It shows a 140 -- excuse me -- strike that.</p> <p>18 It says a \$14,000 cash deposit into that</p> <p>19 account. Do you have any recollection --</p> <p>20 MR. CHOUDHRI: Objection, form.</p> <p>21 MS. HOOD: Form.</p> <p>22 Q. (BY MR. BALLASES:) -- of depositing cash</p> <p>23 within this account?</p> <p>24 MS. HOOD: Form.</p> <p>25 A. Yes.</p>
<p style="text-align: right;">Page 179</p> <p>1 amount of \$82,786.96. Do you see that?</p> <p>2 A. Yes.</p> <p>3 MS. HOOD: Form.</p> <p>4 MR. CHOUDHRI: Objection, form.</p> <p>5 Q. (BY MR. BALLASES:) And the date is February</p> <p>6 1st of 2021. Do you see that?</p> <p>7 A. Yes.</p> <p>8 MS. HOOD: Form.</p> <p>9 MR. CHOUDHRI: Objection, form.</p> <p>10 Q. (BY MR. BALLASES:) Okay. And you see on the</p> <p>11 reverse page, it was signed -- it says, I think,</p> <p>12 "S. Choudhri" there?</p> <p>13 MS. HOOD: Form.</p> <p>14 MR. CHOUDHRI: Objection, form.</p> <p>15 Q. (BY MR. BALLASES:) Can you tell the Court why</p> <p>16 Mr. Choudhri was depositing -- Mr. Ali Choudhri was</p> <p>17 deposition \$82,786.96 into your account at Frost Bank?</p> <p>18 MR. CHOUDHRI: Objection, form.</p> <p>19 MS. HOOD: Form.</p> <p>20 A. I don't remember at all.</p> <p>21 Q. (BY MR. BALLASES:) Okay. If Mr. Choudhri was</p> <p>22 trying to hide money from creditors, would it make</p> <p>23 sense for him to deposit the funds into this account in</p> <p>24 the name of his mom and sister?</p> <p>25 MS. HOOD: Object to form.</p>	<p style="text-align: right;">Page 181</p> <p>1 Q. (BY MR. BALLASES:) Okay. What can you tell</p> <p>2 me about the deposit of 14,000 cash?</p> <p>3 MS. HOOD: Form.</p> <p>4 MR. CHOUDHRI: Objection, form.</p> <p>5 A. I don't remember.</p> <p>6 Q. (BY MR. BALLASES:) Okay. You don't remember.</p> <p>7 A. And the one thing, is my son is not hiding</p> <p>8 money anywhere. He is doing everything okay. And I</p> <p>9 have a problem, the memory. Otherwise, I'm doing the</p> <p>10 same thing and I would do it all.</p> <p>11 Q. Okay.</p> <p>12 A. The only thing, I'm not in the position to</p> <p>13 answer the question because I'm not in good shape.</p> <p>14 Q. I appreciate that and we're almost done.</p> <p>15 If we turn, staying within Exhibit 37, but we</p> <p>16 turn to -- Okay. So looking at towards the back of</p> <p>17 Exhibit 37, there is a -- looks like a cashier's check.</p> <p>18 It's number -- Cashier's Check No. 569009012. Do you</p> <p>19 see that?</p> <p>20 MS. HOOD: Form.</p> <p>21 MR. CHOUDHRI: Objection, form.</p> <p>22 A. Yes.</p> <p>23 Q. (BY MR. BALLASES:) Okay. And it shows that</p> <p>24 this a -- the "Remitter" is yourself, "Shahnaz A.</p> <p>25 Choudhri." Do you see that?</p>

<p style="text-align: right;">Page 182</p> <p>1 MS. HOOD: Objection, form.</p> <p>2 MR. CHOUDHRI: Objection, form.</p> <p>3 Q. (BY MR. BALLASES:) Okay. And this is "Pay to</p> <p>4 the order of: JLM Law, PLLC, Jennifer MacGeorge"; do</p> <p>5 you see that?</p> <p>6 A. Yes.</p> <p>7 MR. CHOUDHRI: Objection, form.</p> <p>8 MS. HOOD: Form.</p> <p>9 Q. (BY MR. BALLASES:) Okay. Can you -- and it's</p> <p>10 dated April 2nd of 2024. Do you see that?</p> <p>11 MS. HOOD: Form.</p> <p>12 MR. CHOUDHRI: Objection, form.</p> <p>13 A. Yes.</p> <p>14 Q. (BY MR. BALLASES:) Okay. Can you tell the</p> <p>15 Court why you were paying \$50,000 in April of 2024</p> <p>16 for -- or to Jennifer MacGeorge?</p> <p>17 MS. HOOD: Form.</p> <p>18 MR. CHOUDHRI: Objection, form.</p> <p>19 A. I know, but I don't remember it.</p> <p>20 Q. (BY MR. BALLASES:) So do you remember why --</p> <p>21 A. No. I said I don't remember it. I know this</p> <p>22 one is this, but I don't remember when it happened.</p> <p>23 Q. Yeah. You've, I think, told us that you've</p> <p>24 never hired Jennifer MacGeorge as your attorney?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 184</p> <p>1 Q. (BY MR. BALLASES:) Okay. And it says it's</p> <p>2 "Paid to the order" of yourself, "Shahnaz Akhter</p> <p>3 Choudhri." Do you see that?</p> <p>4 MS. HOOD: Objection, form.</p> <p>5 A. Yes.</p> <p>6 Q. (BY MR. BALLASES:) Okay. And the amount is</p> <p>7 \$100,000?</p> <p>8 A. Yes.</p> <p>9 MS. HOOD: Form.</p> <p>10 MR. CHOUDHRI: Objection, form.</p> <p>11 Q. (BY MR. BALLASES:) Okay. Dated April 24th,</p> <p>12 of 2024 --</p> <p>13 A. I don't recognize anything.</p> <p>14 MS. HOOD: Form.</p> <p>15 MR. CHOUDHRI: Objection, form.</p> <p>16 A. I don't know what's going on.</p> <p>17 Q. (BY MR. BALLASES:) Okay. Let me finish the</p> <p>18 statement -- the question.</p> <p>19 So the check is dated April 24th, 2024. Do</p> <p>20 you see that?</p> <p>21 A. Yes.</p> <p>22 MR. CHOUDHRI: Objection, form.</p> <p>23 MS. HOOD: Objection, form.</p> <p>24 Q. (BY MR. BALLASES:) Okay. I think I know what</p> <p>25 you're going to say, but could you tell the Court why</p>
<p style="text-align: right;">Page 183</p> <p>1 MS. HOOD: Form.</p> <p>2 A. No.</p> <p>3 Q. (BY MR. BALLASES:) That's right? Have you</p> <p>4 ever hired Jennifer MacGeorge as an attorney?</p> <p>5 A. No. I don't know.</p> <p>6 MS. HOOD: Form.</p> <p>7 A. I don't remember.</p> <p>8 Q. (BY MR. BALLASES:) Is the only attorney</p> <p>9 you've ever hired Ms. Lori Hood that's here today?</p> <p>10 A. I don't remember. I don't remember.</p> <p>11 Q. Okay. Turn to looks like the last page of</p> <p>12 Exhibit 37. Yes.</p> <p>13 Okay. If we turn to the last page of Exhibit</p> <p>14 37.</p> <p>15 A. Uh-huh.</p> <p>16 Q. It shows an official check from Metro City</p> <p>17 Bank, Check No. 1800000023. Do you see that?</p> <p>18 A. Yes.</p> <p>19 MR. CHOUDHRI: Objection, form.</p> <p>20 Q. (BY MR. BALLASES:) Okay. And it shows the</p> <p>21 "Remitter" is "50BH Acquisitions, LLC"; do you see</p> <p>22 that?</p> <p>23 A. Yes.</p> <p>24 MR. CHOUDHRI: Objection, form.</p> <p>25 MS. HOOD: Form.</p>	<p style="text-align: right;">Page 185</p> <p>1 you're getting \$100,000 in April of '24 from 50BH</p> <p>2 Acquisition, LLC --</p> <p>3 A. I don't know.</p> <p>4 MS. HOOD: -- form and sidebar.</p> <p>5 MR. CHOUDHRI: Objection, form.</p> <p>6 Q. (BY MR. BALLASES:) Okay. As we sit here</p> <p>7 today, we've talked about this Frost Bank account of</p> <p>8 yours and your daughter Mobeen and we've seen, you</p> <p>9 know, and I'm ballparking this, but transactions</p> <p>10 exceeding -- exceeding \$6 million go out of this</p> <p>11 account in the last few years.</p> <p>12 And as I understand your testimony, you</p> <p>13 cannot tell us -- you do not recall what any of those</p> <p>14 transfers pertain to; is that right?</p> <p>15 MR. CHOUDHRI: Objection, form.</p> <p>16 MS. HOOD: Object to the form and I</p> <p>17 object to the sidebar and object to the testimony and</p> <p>18 her -- you misrepresenting her testimony.</p> <p>19 Q. (BY MR. BALLASES:) Is that right, ma'am?</p> <p>20 MR. CHOUDHRI: Objection, form.</p> <p>21 A. Yes. I only know --</p> <p>22 MR. CHOUDHRI: Objection, form.</p> <p>23 A. -- I owe (sic) the money to my daughter and</p> <p>24 she's returning, but she's not authorized to sign in my</p> <p>25 account, in this one. But she's also, we are trying</p>

<p style="text-align: right;">Page 186</p> <p>1 to, but she's not authorized on this account and she</p> <p>2 pay me the money, whatever I loan it.</p> <p>3 MR. CHOUDHRI: Objection, form.</p> <p>4 Q. (BY MR. BALLASES:) Okay. So regarding all</p> <p>5 these transfers regarding real property, you -- even</p> <p>6 though it's in excess of \$6 million, you can't tell us</p> <p>7 what those pertain to?</p> <p>8 MR. CHOUDHRI: Objection, form.</p> <p>9 MS. HOOD: Object to form. Object to</p> <p>10 the misrepresentation of her testimony. She says she</p> <p>11 doesn't remember, not she can't tell you.</p> <p>12 MR. BALLASES: Thank you.</p> <p>13 Q. (BY MR. BALLASES:) And if we look at the</p> <p>14 wires that were made into your Frost Bank account --</p> <p>15 A. One thing --</p> <p>16 MS. HOOD: Huh-uh, huh-uh. Don't --</p> <p>17 MR. CHOUDHRI: There's no question on</p> <p>18 the table.</p> <p>19 MS. HOOD: Don't say anything.</p> <p>20 THE WITNESS: Okay.</p> <p>21 Q. (BY MR. BALLASES:) So if we look at Exhibit</p> <p>22 33, which are the wires into your Frost Bank account,</p> <p>23 we see in excess of \$14 million wired into this account</p> <p>24 over the last several years. And you can not tell us,</p> <p>25 as you sit here today, why those wires were made into</p>	<p style="text-align: right;">Page 188</p> <p>1 MR. CHOUDHRI: Objection, form.</p> <p>2 Q. (BY MR. BALLASES: -- such that you filed an</p> <p>3 income tax return?</p> <p>4 A. I don't remember.</p> <p>5 MS. HOOD: Form.</p> <p>6 Q. (BY MR. BALLASES:) Okay. What about if I</p> <p>7 asked you that same question from 2020 through 2023 if</p> <p>8 you -- if you earned income and filed a tax return,</p> <p>9 would your answer be the same?</p> <p>10 MS. HOOD: Form.</p> <p>11 MR. CHOUDHRI: Objection, form.</p> <p>12 A. Yes.</p> <p>13 Q. (BY MR. BALLASES:) Okay. I think I recall</p> <p>14 you telling me when you do file tax returns, you do it</p> <p>15 at Anderson Tax; is that right --</p> <p>16 A. Yes.</p> <p>17 MR. CHOUDHRI: -- objection, form.</p> <p>18 MS. HOOD: Form.</p> <p>19 Q. (BY MR. BALLASES:) As you sit here today, can</p> <p>20 you tell us your primary bank that you bank at --</p> <p>21 A. I don't know.</p> <p>22 MS. HOOD: -- form.</p> <p>23 MR. CHOUDHRI: Objection, form.</p> <p>24 Q. (BY MR. BALLASES:) Do you have a recollection</p> <p>25 of any other bank accounts in which money from</p>
<p style="text-align: right;">Page 187</p> <p>1 this account, can you?</p> <p>2 MS. HOOD: Objection, form.</p> <p>3 MR. CHOUDHRI: Objection, form.</p> <p>4 MS. HOOD: Objection to the</p> <p>5 misrepresentation of her testimony.</p> <p>6 MR. CHOUDHRI: Asked and answered.</p> <p>7 A. I don't know. I've already explain to you.</p> <p>8 Q. (BY MR. BALLASES:) Okay.</p> <p>9 A. And you'll notice --</p> <p>10 MS. HOOD: Huh-uh, huh-uh. Don't --</p> <p>11 MR. CHOUDHRI: Objection. There's no</p> <p>12 question on the table.</p> <p>13 Q. (BY MR. BALLASES:) So when we spoke in your</p> <p>14 last deposition, you talked to me about that you filed</p> <p>15 income tax returns. Do you remember that?</p> <p>16 A. Yes.</p> <p>17 MR. CHOUDHRI: Objection, form.</p> <p>18 Q. (BY MR. BALLASES:) Okay. So in -- in 2018,</p> <p>19 did you have income such that you filed an income tax</p> <p>20 return?</p> <p>21 A. I don't remember.</p> <p>22 MS. HOOD: Object to form.</p> <p>23 MR. CHOUDHRI: Objection, form.</p> <p>24 Q. (BY MR. BALLASES:) Okay. What about in 2019,</p> <p>25 did you have income --</p>	<p style="text-align: right;">Page 189</p> <p>1 Mr. Choudhri's business endeavors have gone into that</p> <p>2 account?</p> <p>3 A. I don't know.</p> <p>4 MS. HOOD: Objection, form.</p> <p>5 Q. (BY MR. BALLASES:) Do you have any</p> <p>6 recollection of another bank account that we haven't</p> <p>7 discussed in which you were the owner of the account</p> <p>8 and monies are going out to pay for Mr. Ali Choudhri's</p> <p>9 business endeavors?</p> <p>10 MR. CHOUDHRI: Objection, form.</p> <p>11 MS. HOOD: Form.</p> <p>12 A. I don't know.</p> <p>13 MR. BALLASES: Okay. Okay. Well,</p> <p>14 Ms. Choudhri, I appreciate your time. You are done.</p> <p>15 Have a great --</p> <p>16 THE WITNESS: Thank you so much. This</p> <p>17 is hard for me.</p> <p>18 MR. BALLASES: I -- I understand.</p> <p>19 Have a great Thanksgiving.</p> <p>20 THE WITNES: Okay. You too.</p> <p>21 MR. BALLASES: Rest easy.</p> <p>22 THE WITNESS: Okay.</p> <p>23 MR. BALLASES: Feel better.</p> <p>24 THE VIDEOGRAPHER: Off the record at</p> <p>25 3:34.</p>

Shahnaz Choudhri

November 25, 2024

190 to 193

Page 190	Page 192
1 (Back on the record without video.)	1 WITNESS CORRECTIONS AND SIGNATURE
2 THE REPORTER: Back on the record at	2 Please indicate changes on this sheet of paper, giving
3 3:35 p.m.	3 the change, page number, line number and reason for the
4 MS. HOOD: Counsel, we had an	4 change. Please sign each page of changes.
5 agreement, I believe, the first day of her deposition	5 PAGE/LINE CORRECTION REASON FOR CHANGE
6 that she'd be allowed to read and sign it.	6 _____
7 MR. BALLASES: I mean, I don't recall	7 _____
8 having her read or not, but I'm fine with her reading	8 _____
9 and signing.	9 _____
10 MS. HOOD: Okay.	10 _____
11 THE REPORTER: If it wasn't said, I'm	11 _____
12 going to say this for me, because if it wasn't said, I	12 _____
13 didn't do it. But I know it was sent to the people	13 _____
14 that ordered it.	14 _____
15 MR. BALLASES: Yeah.	15 _____
16 MS. HOOD: She's going to be able to	16 _____
17 read and sign.	17 _____
18 MR. CHOUDHRI: So the record is clear,	18 _____
19 the deposition from last time and today's a	19 _____
20 continuation and this is read and sign, so the deponent	20 _____
21 will be provided a copy of the deposition so she can	21 _____
22 read it and sign it pursuant to the Rules and that's	22 _____
23 what I believe the parties have agreed to.	23 _____
24 MS. HOOD: Okay.	24 _____
25 MR. BALLASES: Yeah, this one is going	25 _____
	Shahnaz Choudhri
Page 191	Page 193
1 to be sent to her. I mean, the other one has already	1 I, Shahnaz Choudhri, have read the foregoing
2 been sent out to everybody, but this one is going to go	2 deposition and hereby affix my signature that same is
3 to her.	3 true and correct, except as noted above.
4 MS. HOOD: I didn't --	4 _____
5 MR. CHOUDHRI: It wasn't sent to her.	5 Shahnaz Choudhri
6 So it will get sent to her. The continuation of the	6 STATE OF TEXAS )
7 deposition from last time is as we agreed --	7 COUNTY OF _____ )
8 THE REPORTER: Whoever ordered on the	8 Before me, _____, on this day
9 record was Ms. MacGeorge --	9 personally appeared Shahnaz Choudhri, known to me (or
10 MS. HOOD: Okay. She's my witness so	10 proved to me under oath through _____) to be the
11 you have to send it to me to read and sign.	11 person whose name is subscribed to the foregoing
12 THE REPORTER: Not if it's not said.	12 instrument and acknowledged to me that they executed
13 MS. HOOD: Okay. Well, I don't want	13 the same for the purposes and consideration therein
14 to play games with you, we always say it. We said it	14 expressed.
15 now.	15 GIVEN UNDER MY HAND AND SEAL OF OFFICE, on this,
16 MR. CHOUDHRI: We said it today. We	16 _____ day of _____, 2024.
17 said it now. So we're clear, this is a continuation	17 _____
18 and we'll have one complete depo and we'll read and	18 _____
19 sign.	19 Notary Public, State of Texas
20 MS. HOOD: Okay. Now we're off the	20 My Commission Expires: _____
21 record.	21 _____
22 MR. CHOUDHRI: Thank you. Now we're	22 _____
23 off the record.	23 _____
24 (Proceedings concluded.)	24 _____
25	25 _____

Shahnaz Choudhri

November 25, 2024

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1 IN THE UNITED STATES BANKRUPTCY COURT  
2 FOR THE SOUTHERN DISTRICT OF TEXAS  
3 HOUSTON DIVISION  
4 IN RE: )  
5 ) CASE NO: 22-32998  
6 HOUSTON REAL ESTATE PROPERTIES )  
7 LLC, ) CHAPTER 7  
8 Debtor. )  
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JOHN QUINLAN )  
and )  
OMAR KHAWAJA )  
and )  
OSAMA ABDULLATIF, )  
Plaintiffs, )  
vs. ) ADVERSARY NO. 23-3141  
JETALL COMPANIES, INC. )  
and )  
ARABELLA PH 3201 LLC )  
and )  
9201 MEMORIAL DR. LLC )  
and )  
2727 KIRBY 26L LLC )  
and )  
DALIO HOLDINGS I, LLC )  
and )  
DALIO HOLDINGS II, LLC )  
and )  
HOUSTON REAL ESTATE PROPERTIES )  
LLC )  
and )  
SHAHNAZ CHOUDHRI )  
and )  
ALI CHOUDHRI )  
and )  
SHEPHERD-HULDY DEVELOPMENT I, )  
LLC )  
and )  
SHEPHERD-HULDY DEVELOPMENT II, )  
LLC )  
and )  
GALLERIA LOOP NOTE HOLDER LLC )  
and )

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1 A. KELLY WILLIAMS )  
2 and )  
3 MOUNTAIN BUSINESS CENTER, LLC )  
4 and )  
5 RANDY W. WILLIAMS CH7 TRUSTEE )  
6 and )  
7 OTISCO RDX LLC )  
8 and )  
9 MCITBE, LLC )  
10 and )  
11 JETALL/CROIX PROPERTIES LP )  
12 and )  
13 JETALL/CROIX GP, LLC, )  
14 Defendants. )  
15  
16  
17  
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21  
22  
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24  
25

REPORTER'S CERTIFICATE  
ORAL VIDEOTAPED DEPOSITION OF  
SHAHNAZ CHOUDHRI  
NOVEMBER 25, 2024

I, NILDA CODINA, Notary in and for the State of  
Texas, hereby certify to the following:

That the witness, SHAHNAZ CHOUDHRI, was duly sworn  
by the officer and that the transcript of the oral  
deposition is a true record of the testimony given by  
the witness;

I further certify that pursuant to FRCP Rule 30  
(e)(1) that the signature of the deponent:

\_\_\_\_\_X\_\_\_\_\_ was requested by the deponent or a party  
before the completion of the deposition and returned  
within 30 days from the date of receipt of the  
transcript. If returned, the attached Changes and  
Signature Page contains any changes and the reason  
therefor;

\_\_\_\_\_ was not requested by the deponent or a

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1 party before the completion of the deposition.  
2 I further certify that I am neither attorney nor  
3 counsel for, related to, nor employed by any of the  
4 parties to the action in which this testimony was  
5 taken.  
6 Further, I am not a relative or employee of any  
7 attorney of record in this cause, nor do I have a  
8 financial interest in the action.  
9 Subscribed and sworn to on this 16th day of  
10 December, 2024.  
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*Nilda Codina*

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NILDA CODINA  
Notary in and  
for the State of Texas  
My Commission No. 12878135-3  
Expires: 10/24/2027

U.S. Legal Support, Inc.  
Firm Registration No. 122  
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